

Katrina Braehmer

From: Greg Carr <greg99pole@gmail.com>
Sent: Monday, April 28, 2025 9:56 AM
To: Katrina Braehmer; Scott Orr
Subject: Draft Environmental Justice Element

EXTERNAL

Please forward these comments to the appropriate staff for inclusion in the record.

1. The designation of EJ communities using census tracts for the boundaries is probably the best available method of distinguishing areas of economic differences, but there is a concern that census tracts do not always follow boundaries that accurately reflect those differences. For example, one of the tracts in the Springs includes both portions of the developed urban highway 12 corridor and the rural hills to the east. In order to avoid applying EJ policies in areas that do not really qualify as EJ in character, the EJ policies need to be applied to actual community characteristics within the tracts rather than including the unqualified areas.
2. The Element recommends that large areas of the County be designated as EJ communities, well beyond what is mandated by the State. That is fine, as long as it doesn't contradict other important GP goals and policies such as the Housing Element. Since "housing burden" is recommended as an EJ issue, it would be unfortunate if the EJ designation became a rationale for excluding affordable housing projects in communities that would not otherwise raise EJ concerns. For example, staff has mentioned in prior hearings that workforce housing at the County administration center would not be allowed despite its inclusion in the Housing Element. The element needs to be clear that these designations would not unduly interfere with implementation of the Housing Element or other conflicting GP goals and policies.
3. Goal EJ-3 addresses park and recreation needs and identifies the areas of need on its maps.. The existing Open Space and Resource Conservation Element also designates areas of park needs under Policy OSRC-17b. These designated areas are then shown on the OSRC maps. Will the proposed park needs replace the existing designated areas...or add to them? Either way, the differences between the two elements need to be rectified.
4. Goal EJ-8 recommends that the County "Prevent homelessness....". While laudable, since the prevention of homelessness is not really feasible, the goal should be modified to reflect a strong commitment but with a touch of reality.

Thanks for your consideration

Greg Carr

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Katrina Braehmer

From: stephen finnegan <stephenfinnegan@yahoo.com>
Sent: Thursday, April 24, 2025 7:33 AM
To: GeneralPlan
Cc: HCT COPE; Vicki Clewes
Subject: Suggestions for safety section
Attachments: IMG_0813.jpeg; 52CE7FBA-F7D8-4A3E-BB14-96E93ACDB62C.jpeg; IMG_0814.jpeg; 425CC76D-0B43-4E2F-A9D4-60B5D299E843.jpeg; HCT COPE PLANNING MAP Draft 3 Review 3_All.pdf

EXTERNAL

Hello,

I'm sorry I missed the recent zoom workshop regarding updating the safety element of the general plan.

Is it possible to receive a recorded copy of the April 23 rd Zoom session to review?

I completed the online survey and made some suggestions through the survey.

I would like to include a suggestion regarding one of the maps included in the appendix report.

I have included the link to the appendix as well a screenshot of the page 290 figure 4.6

I believe you should consider adding Hacienda, Hollydale, Canyon, and Terrace as part of this area identified by parcels with one access and egress. Also, these areas also have COPES.

There should be a separate opportunity for these groups to discuss this safety plan to offer input.

There is a community meeting scheduled May 10 in Oddfellows, which would be an excellent opportunity for permit Sonoma to listen to community input regarding safety concerns in the area

I am including one of the founders of the Hollydale Canyon Terrace, COPE group HCT COPE on this email. She has been in communication with Nancy Brown and Linda Hopkins office regarding ongoing communication and collaboration with the HCT COPE.

This has included creating a map for our neighborhood. This map includes temporary staging areas for evacuation, as well as footpaths for residents to egress during wildfires and floods.

Please consider including additional information regarding pedestrian egress footpaths in these areas that have very limited vehicle egress. This is especially true during the initial phases of a fire when some communities have Advised residents not to evacuate by vehicle until emergency vehicles Have been able to gain access.

I am also including Vicky Clews from the lower Russian River Mac, who has brought some of these concerns to Supervisor Hopkins office as well as County Roads, which has not provided a timeline for road repairs or brush removal along summer home Park Road.

Do you think it is possible to add a 13th section to the figure 4.6 in order to include the areas of Hacienda, Hollydale, Canyon, and Terrace? Or, can you expand area 12 to include these areas? It's not clear why they were not included initially. All of these areas have multiple areas with only one way in and out.

Is there someone in your office who could be a point of contact for future questions and, what is the timeline for the final report? Will there be additional opportunities for public input?

Thank you for your time and consideration!

Steve Finnegan
10982 Terrace Drive
Middle Terrace fuels management
HCT COPE Road and trails mapping
415-290-5598

Draft safety element appendixes:

<https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Long%20Range%20Plans/General%20Plan/Environmental%20Justice/Sonoma-County-Safety-Element-Public-Review-Draft-Appendices-April%202025.pdf>

Draft safety element:

<https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Long%20Range%20Plans/General%20Plan/Environmental%20Justice/Sonoma-County-Safety-Element-Public-Review-Draft-April-2025.pdf>

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Sonoma County Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403
Via email: GeneralPlan@sonoma-county.org

Subject: Food System Alliance feedback on Draft Environmental Justice Element

April 30th, 2025

Dear Sonoma County Planning Staff,

Thank you for the planning department's ongoing willingness to hear our input regarding food and agriculture policy in Sonoma County. We appreciate the planning staff for aligning the Environmental Justice (EJ) Element with our Food Action Plan. There are a few policies in the EJ element that we strongly support and several areas where the policies could be strengthened in order to better support our local food system.

Specific policies we support and would like to see maintained:

- EJ-6c: Facilitate and support community-level opportunities for food production including urban agriculture such as community gardens, edible landscaping and school yards, and farmers' markets. Support the use of County lands for food production where appropriate.
 - Suggestion: Consider moving farmers' markets from this policy, which is about food production, to policy EJ-6a with the other examples of food retailers.
- EJ-6f: Promote locally sourced food, including farm-to-school programs, partnerships between local farms and stores, and seasonal farm stands. Prioritize local food procurement in County purchasing when feasible.
- EJ-6i: Secure funding to systematically measure food insecurity and need in Sonoma County and identify gaps in service to inform policy and action. Explore public-private partnerships for data collection and sharing.
 - Several members of the Food System Alliance were involved with the Hunger Index and are available to help restart that effort.
- EJ-6j: Explore opportunities to facilitate diversified local farming to protect the local food system from supply and distribution issues during large-scale disaster events and support the economic viability of the County's agricultural industry.

Suggestions to strengthen food system policies:

- Support food hubs to aggregate and process locally grown food, which will help schools and institutions purchase more from local farmers and will serve as an incubator for small food processors.
- Encourage private property owners and developers to provide opportunities for residential gardening and urban agriculture, particularly in EJ Communities.

The Food System Alliance is available to help with policy development on all of these issues including providing examples of policies from other jurisdictions.

Respectfully submitted on behalf of the Sonoma County Food System Alliance membership,

Phina Borgeson
Interfaith Sustainable Food Collaborative

Suzi Grady
Petaluma Bounty

Wendy Krupnick
Chiatri de Laguna Farm

April 30th, 2025

Sonoma County Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

RE: Comments on the Environmental Justice Element and Safety Element

Dear Planning Commission and Planning Staff,

Thank you for providing the opportunity to comment on the draft Environmental Justice Element and Safety Element of the Sonoma County General Plan. These elements include goals, policies, and actions that are specific, comprehensive, and provide a roadmap of strategies that the county can take to increase climate and disaster resilience for populations made sensitive by systems. We were excited to see the inclusion of policies and goal statements focused on promoting complete neighborhoods, advancing tenants rights, developing meaningful relationships with trusted community-based organizations, and adopting nature-based solutions. While overall we were pleased with the existing draft, below is some general feedback that would bolster the effectiveness of these Elements as well as some specific recommendations to further strengthen both elements to advance transformative change.

Suggestions we Recommend Incorporating Throughout the Safety and EJ Elements:

- **Increase measures of accountability** by providing more detailed and specific information related to supporting agencies, including who is responsible for implementation.
- **Identify and create more measurable and specific metrics** for evaluating policy implementation. We recommend adding timelines and more detailed metrics to improve accountability.
- **Addressed the role of structural oppression and barriers** in contributing to individual risk and vulnerability (“population made sensitive by systems”). This could be strengthened by specifically calling out systems of oppression, such as racism and colonialism.
- **Include considerations of groundwater rise and risk of contamination** in the sea level rise section of the Safety Element. Consider incorporating language such as: *Integrate groundwater rise into studies of sea level rise policies*. We recommend taking an integrated planning approach that addresses rising seas and groundwater simultaneously, from the vulnerability and risk assessment phase through to adaptation implementation.

Environmental Justice Element Recommendations

Policies from the EJ Element to strengthen:

- **Policy EJ-1c: Consider requiring health risk assessments for projects where construction or operation of the project exposes sensitive land uses to toxic air contaminants.**
 - Strengthen language by “*requiring*” health risk assessments rather than encouraging their consideration.
- **Goal EJ- 7: Prioritize resources in Environmental Justice Communities and housing burdened communities to improve living conditions and home safety.**
 - Sample policy language revision to strengthen the goal statement: *Equitable access to safe and sanitary homes among all communities so that no resident has to live in an unsafe or unhealthy place. Ensure that future improvements in disadvantaged communities will not produce a net loss of affordable housing or the displacement of residents.*
- **Policy EJ-7d: Prioritize identifying supplemental funding sources, including grants, and resources for the retrofit, rehabilitation, and repair of housing units occupied by low-income renters or property owners.**
 - Sample policy language revision to strengthen the statement: *Obtain funding for, address barriers to, and increase participation in the weatherization program for extremely low, very low, and low-income homeowners, landlords, and renters, as well as in other programs to provide resources to bring older properties up to Code and improve their livability. Make minor home repairs and energy improvements, and improve health and quality of life. Focus these resources on homes in disadvantaged communities, and in particular rental housing and high density housing.*
- **Goal EJ-10: Actively acknowledge and respect the sovereignty of Tribal Nations within the county and strive to build lasting governmental relationships with Tribal Nations.**
 - Sample policy language revision to strengthen the goal statement: *Indigenous peoples have the right to the lands, territories, and resources which they have traditionally owned, occupied, or otherwise used or acquired. Land rights, recognition, and repatriation should be considered in direct and specific engagement with Tribal Governments through a formal engagement process and alignment with Tribal Government priorities and decisions when identifying greenbelt lands for permanent protection, particularly when public funds are at play.*

Policies From the EJ Element we support:

- Policy EJ-4f: Promote complete neighborhoods that have safe and convenient access to needed goods and services and that support physical activity, including walking, bicycling, and recreational opportunities.
- Policy EJ-5e: Periodically review the boundaries of Environmental Justice Communities and update as appropriate based on data and community input.

- Policy EJ-6j: Explore opportunities to facilitate diversified local farming to protect the local food system from supply and distribution issues during large-scale disaster events and to support the economic viability of the County's agricultural industry.
- Policy EJ-7e: Continue to partner with legal aid and tenant rights' organizations to protect residents from displacement or adverse living conditions by disseminating information and resources regarding tenants' rights.
- Policy EJ-9c: Remove barriers to participation by offering incentives, such as stipends or childcare and food, for participants in engagement opportunities. Pursue funding sources to provide stipends and other incentives.
- Policy EJ-9e: Create engagement opportunities that provide for co-creation of policy and program design so that Environmental Justice Communities are a part of the decision-making process in policies and practices that impact their neighborhoods, their lives, and the community as a whole.
- Policy EJ-9h: Foster meaningful relationships with community-based organizations to increase engagement of Environmental Justice Communities and other underrepresented community members in public decision-making processes. Explore the establishment of formal partnerships with community-based organizations, through mechanisms such as Memorandums of Understanding, to support community engagement on key County priorities.

Safety Element Recommendations

Policies from the Safety Element to strengthen:

- **Policy SE-5b: Maintain defensible space and additional vegetation management around critical transportation and utility infrastructure at-risk to wildfire hazards.**
 - Consider complementing this policy by adding an additional policy or language focused on the need to: *Assess feasibility of creating a Community Wildfire Resilience Zone in the one-quarter-mile area around communities in high and very high fire hazard severity zones to promote responsible land uses, guide land stewardship activities, and provide permanent and consistent risk reduction.*
- **Policy SE-5j: Consider climate impacts and risk in the design of capital improvements.**
 - This could be strengthened by *requiring* the evaluation of climate impacts and risk in capital improvement planning.
- **Policy SE-8g: Require fire protection plans for all new discretionary developments in all High and Very High Fire Hazard Severity Zones. Ensure the plans include a site-specific risk analysis and address fire response capabilities, compliance with fire safety requirements including but not limited to defensible space, access and water supply, building materials and site design, emergency preparedness and evacuation plans, property maintenance, and other hazard and risk reduction measures.**
 - This could be strengthened by adding language requiring that fire protection plans for new discretionary developments be reviewed and approved by the City.

- **Policy SE-9i: Encourage efforts to restore wildfire impacted areas and reduce the potential for post-fire flooding and landslides through replanting of native vegetation cover using best practices and slope stabilization measures.**
 - This could be strengthened by adding language around the use of prescribed burns in increasing wildfire resilience and encouraging greenbelt preservation to return beneficial wildfire regimes and increase overall wildfire resilience of the landscapes.

Policies from the Safety Element we support:

- Policy SE-1c: Continue to prepare for increased capacity and redundancy during emergencies through strategic coordination and partnerships, such as through memorandums of understanding, before disasters occur between community-based organizations, fire agencies, CAL FIRE, the Department of Emergency Management, the Sheriff's Office, and other public safety partners.
- Policy SE-1d: Invest in building trust and relationships with community-based organizations to improve communication systems, address language access needs, and develop a shared understanding of community needs and resources available (such as legal or medical support, transportation, and evacuation or resilience centers) as a core strategy for emergency preparedness. Assist with building community-based organizations capacity to support their community members during a disaster.
- Policy SE-2b: Continue to refine protocols for dissemination of information during an emergency through all available media sources to ensure that messages are coordinated, accurate, and available in multiple languages. Coordinate information flow between frontline emergency personnel, media sources, school districts, and other community channels.
- Policy SE-3c: Partner with the cities, community groups, and other relevant agencies or organizations to ensure people have access to medical and mental health services and resources in the aftermath of disasters. Where feasible, deploy mobile clinics to provide medical and mental health services in affected areas, ensuring accessibility for people with physical limitations or transportation barriers.
- Policy SE-5f: Continue to explore funding sources for capital improvements necessary for emergency response. Prioritize capital improvements and maintenance of existing at-risk facilities and infrastructure serving the greatest number of people and systemically vulnerable communities, and improvements to existing facilities that ensure they can operate as resilience centers, local assistance centers, or other community resource centers during emergency events
- Policy SE-8f: In Very High Fire Hazard Severity Zones, avoid new residential development and new or expanded commercial or industrial development that involves highly flammable materials or that could place large numbers of occupants at unreasonable risk of wildfire, where feasible. Prioritize new housing in areas with lower wildfire hazard.
- Policy SE-9g: Support and prioritize wildfire resilience projects on natural and working lands, including wildlands, that have multiple benefits, including but not limited to wildfire

hazard and risk reduction, species and habitat protection, agricultural and forest resource protection, water quality, and carbon sequestration and storage. Consider the ecological, environmental, social, and economic benefits and tradeoffs. Utilize existing plans and guidance, such as the Climate Resilient Lands Strategy, to inform project dePolicy SE-11a: Encourage and participate in multi-benefit, nature-based solutions, such as restoration and conservation projects on natural and working lands, that increase flood resilience, reduce risks of related hazards such as landslides and erosion, and improve watershed management

- Policy SE-13k: Avoid siting of hazardous waste repositories, incinerators, or similar facilities intended primarily for hazardous waste disposal in any area designated for urban residential or rural residential use or on agricultural lands or at County approved solid waste disposal facilities.
- Policy SE-13l: Site hazardous waste facilities which have the primary purpose of reuse, recycling, or source reduction of hazardous wastes in areas designated for industrial use in close proximity to users of hazardous materials and/or generators of hazardous wastes.
- Policy SE-15f: Explore the development of programs for private employers to provide hazard pay to include employees working during extreme heat events, wildfires, and unhealthy air quality days.

We greatly appreciate that you have considered our input and recommendations and look forward to working with you to implement these policies and make Sonoma County as sustainable and resilient as possible in the future.

Regards,

Mariah Padilla
North Bay Resilience Manager
Greenbelt Alliance

From: Chris Koch <ckoch812@gmail.com>
Sent: Tuesday, April 29, 2025 4:16 PM
To: GeneralPlan
Subject: Recommendation for inclusion in Safety element of the GEneral Plan

EXTERNAL

The draft Safety Element document notes:

“Safety Elements are a required element in a jurisdiction’s General Plan that characterize and set broader policy and programs for hazard mitigation, risk reduction, and response to natural and human-made hazards. Policies and programs in the Safety Element are aimed at reducing the potential short- and long-term risk of death, injuries, property damage, and economic and social dislocation resulting from hazards. Safety Elements are required to be reviewed and updated as needed upon revision of the LHMP or Housing Element.

...

“A Safety Element is required to address the following: ▪ Protect the community from a variety of risks associated with a variety of hazards, including ... wildland and urban fires (Government Code Section 65302(g)(1)). ... ▪ Map and assess the risk associated with wildfire hazards, and establish a set a goals and policies with related implementation measures to avoid or minimize wildfire risk, protect essential public facilities from wildfire, ensure adequate infrastructure for new development in fire hazard areas, and establish cooperative relationships between public agencies responsible for fire protection (Government Code Section 65302(g)(3)).

...

“The County has conducted an Evacuation Route and Location Assessment as required by Government Code Section 65302.15. (The assessment required by Government Code Section 65302.15 is sometimes referred to as an “AB 747” assessment, referring to the 2019 Assembly Bill 747 that enacted the statute.) This assessment, provided in Appendix B, evaluates roadway capacity and the time required to evacuate geographically large areas under various scenarios. It aims to give a broad understanding of the transportation system capacity during evacuations but does not guarantee that actual evacuations will match the modeled scenarios. The assessment includes details on the scenarios modeled, results of the analysis, and recommendations that were incorporated into this section of the Safety Element as appropriate. The assessment does not specify the time it will take to evacuate any given area in any given emergency scenario but rather provides limited information about areas of the County where evacuation conditions may be less efficient for planning purposes. The results should be viewed as sources of information and not a complete picture of evacuation considerations within the county.”

If this exercise is going to have any meaning or value in addressing the growing wildfire risks to the safety of residents of the County, there must be some mandatory safety elements added to the plan that provide at least a minimal level of protection from making our current problematic conditions worse. The County can’t stop climate change. It can’t control the weather or the winds. It can’t stop the increase in frequency or the increase in intensity of wildfires. But it can make sure the problems don’t get worse through poor planning.

Sonoma Valley is clearly an extremely high risk area with inadequate evacuation infrastructure. The KLD Study, commissioned by the Valley of the Moon Alliance and provided to the County, clearly shows the problem there. And that study in all likelihood understates the problem, as it could not consider the speed of

fire spread or winds, or accidents or other disruptions to transportation infrastructure capacity during evacuations.

Other areas of the County may have similar problems. This plan element is not the place to mandate infrastructure improvements. Whether it is a place to address known severe risks like Sonoma Valley is not clear, as there may be other places in the County that face similar problems.

But it is the place to establish a minimal mandatory safety element to keep the problems from becoming worse.

It's fine to note, as this draft does, that there are industry standard strategies to reduce risks of wildfire to life, property, and the environment, such as structural modifications that make buildings more resistant to ignition from wildfire, forest and wildland management, and landscape-scale projects such as fuel breaks, and education and pre-fire planning – but what is this revision of the Safety Elements of the General Plan going to do to actually make sure the County doesn't allow things to get worse? The lives of Sonoma County residents are at stake.

It is respectfully submitted that a mandatory safety element of the revised plan should state that the County government will not approve any new multi-unit housing development or new commercial development construction that will employ more than 10 people unless there is: 1) an adequate, operable water infrastructure system to provide firefighters with water needed for firefighting at the new development site; and 2) there is adequate transportation infrastructure to safely handle the evacuation of existing and proposed additional residents in the event of a fire evacuation.

It's virtually impossible to predict earthquakes or floods. But -- we know it is matter of not if, but when, the next wildfires will hit Sonoma County. It is a matter of not if, but when, firefighters will be tested with deadly fires. It is a matter of not if, but when, Sonoma County residents will be called on to evacuate for their own safety. This planning document at a minimum should ensure that the County doesn't make a bad situation worse. And ensure that any new development does not add to our problems, but has adequate water infrastructure for firefighting and adequate transportation structure for evacuation before it is approved.

Chris Koch
Kenwood, CA

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Katrina Braehmer

From: Wendy Krupnick <wlk@sonic.net>
Sent: Wednesday, April 30, 2025 9:00 PM
To: Katrina Braehmer
Subject: Comments on draft Safety element

EXTERNAL

Hi Katrina. I know this is last minute but hope you are still accepting comments on the draft Safety element. My comments are as an individual.

I would like to endorse the comments submitted today by Sonia Taylor. I agree with her that not nearly enough emphasis has been given to evacuation needs - as is required by the State. Whether for fire, flood, earthquake or other emergency, it is clear that Sonoma County's population density as well as non-residential use in rural areas far exceeds what the existing roads were built for.

In addition to overload on rural roads, when masses of people and vehicles get to larger arteries, these quickly become bottlenecks as well.

Ms. Taylor raises many detailed questions and concerns that are critically important to address. I'm grateful to her for doing so and hope you all will examine them in depth.

Thank you very much for this important work!

Wendy Krupnick

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From: [Darris](#)
To: [GeneralPlan](#)
Subject: Safety and Justice for all...
Date: Wednesday, April 23, 2025 4:58:32 PM

EXTERNAL

Regarding the General Plan's Public Safety Element and its goal to "Create policies for equitable community safety," there appears to be a significant disconnect between this objective and the county's promotion of wine tourism. While the wine industry is economically important, the extensive marketing of our region as "wine country" raises serious public safety concerns, particularly regarding impaired driving. The millions spent on wine tourism promotion should be balanced against the potential human cost of alcohol-related accidents on our roads.

On environmental justice: The current approach to short-term vacation rentals in Bodega Bay threatens the fabric of our coastal communities. As a full-time resident surrounded by six vacation rental properties, I've witnessed firsthand how this proliferation of short-term rentals erodes neighborhood cohesion and exacerbates our housing affordability crisis. To truly advance environmental justice, the county should implement stronger regulations on vacation rentals to preserve community character and ensure housing remains accessible to long-term residents and working families.

--

Darris. B. Nelson

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Katrina Braehmer

From: kevin padian <kpadian23@yahoo.com>
Sent: Thursday, May 08, 2025 3:25 PM
To: GeneralPlan
Subject: Comments on Appendix B (Safety Element)

EXTERNAL

These are comments on Appendix B of the Sonoma County Safety Element Update – AB 747 Assessment – dated September 30, 2024 and carried out by Rincon Consultants for Fehr and Peers. I ask that they be entered into the record and hopefully used in evaluating traffic evacuation plans for the County. Thank you.

Kevin Padian

Glen Ellen

8 May 2025

Comments on Appendix B (Safety Element)

Fehr & Peers is a reputable firm specializing in traffic and evacuation studies. They provided for the County an Evacuation Study, apparently outsourced to Rincon Consultants, that divided the County into three large regions. This is fine for an (admittedly “general”) initial preliminary assessment, but it will do little to help County officials plan for evacuations. I explain why below.

In contrast, I refer you to an independent ETE (Emergency Traffic Evaluation) study, called the “SAFE Study,” commissioned in 2024 by a coalition of residents and community groups, that focused on the Northern Sonoma Valley (NSV), from the area including Boyes Hot Springs and a bit south, north to the southern border of Oakmont. The Oakmont area had already been assessed in 2023. Both studies were carried out by KLD Associates of San Antonio, TX, a world-renowned firm specializing in all kinds of emergency evacuations. The SAFE study can be accessed through www.VOTMA.org.

This was a fine-grained study based on a wealth of information gathered from public sources, empirically gathered by traffic engineers forming a database of road conditions and configurations, distribution of residents and vehicles in the study area, and reports of NSV residents about their evacuation needs and likely behaviors.

Based on the information in these two reports, it is evident that the Fehr and Peers report is too coarse-grained to be of much help in evacuation planning, even if it does technically fill the requirements of SB 99. Its database and methods appear inferior in major ways to those of the SAFE study carried out by KLD Associates for the NSV. Our residents deserve better.

Some specific deficiencies are pointed out below:

- P. 4, FP and KLD agree that most evacuees will leave within the first hour. It is not clear how FP derived a fine-grained estimate of evacuation percentages broken into 15-minute segments. Their data apparently came from rush-hour figures, which would be irrelevant during an emergency.
- Same section, the SCTA model is not built to assess emergency evacuations, therefore the assumptions in this section could be fallacious. It is not clear how FP developed a “10% reduction in capacity” to account for traffic incidents. If an accident, an abandoned vehicle, or a fallen tree blocks a road, it will likely affect far more than a 10% reduction.
- In scenario 3 (Table 1), which comprises “sectors” 7 (Santa Rosa – Valley of the Moon), 8 (Kenwood – Bennett Valley), and 9 (Sonoma Valley), the “Assumed Evacuation Destinations” for sector 8, which is roughly comparable to the area assessed by the SAFE study (see their Table 5-3), projects that 90% of evacuees will head to Santa Rosa (presumably via Route 12) and Rohnert Park (presumably mostly via Bennett Valley Road), with only 10% heading to Napa and Marin counties. In contrast, the SAFE study projected that for ALL areas in the NSV, except the most northern area, it would be far quicker to head to Marin, Napa, or Petaluma than to Santa Rosa (Cotati was not specifically considered).

It is not clear how FP derived their conclusions about projected NSV evacuation routes, because they did not use the detailed methods that KLD did, which were based on a database of road specifications and residential demographics and self-reported behaviors. Based on the discrepancy between the results and methods of the two studies, I urge caution in relying on the FP study in any but the most broad-brush perspectives.

- P. 6 ff: The “Evacuation Operations Analysis” does not use actual data of numbers of residents, numbers of visitors, numbers of vehicles, distribution among the study area, time needed to reach a major escape artery, or empirical evidence of evacuation behaviors such as number of vehicles each household will take, whether they have to pick up children or wait for someone to come home before they can evacuate, and many other factors that the KLD “SAFE” study evaluated. Instead, they used travel demand models from the Sonoma County Transportation Authority, which are based on travel records during normal traffic hours. The most extreme traffic conditions in this database are those during rush hours. It scarcely needs to be pointed out that in an emergency evacuation the volume of vehicles on the road would increase suddenly (within 60-90 minutes) and be far greater than in any rush

hour; plus, conditions would be far more dangerous due to panic, atmospheric conditions (smoke, fire, darkness), congestion, accidents, and abandonment of vehicles. It is frankly mystifying how any serious traffic evacuation study can be based in any way on rush hour statistics.

- P. 9 ff: It is not clear upon which data the “DTA model” is built, or how it is ground-truthed in evidence that is appropriate and adequate for modeling evacuations.

- P. 12 ff: “Scenario 3” mentions Arnold Drive as a road on which heavy traffic is expected, which is in accordance with the KLD “SAFE” study’s conclusions. However, “Scenario 3” does not acknowledge Arnold Drive as a major evacuation route, emphasizing instead Route 12 and Bennett Valley Road. KLD’s study shows that, whereas both of those routes would be heavily used, depending on the direction of the fire, Arnold Drive southward and Route 12 southward would be the major arteries. Route 116 would be important only later in the evacuation, and it would be draining traffic from the City of Sonoma as well as part of the NSV traffic. Petaluma was not concluded to be a major evacuation destination compared to those in Marin and Napa counties.

I conclude that the recommendations submitted to date by the consultants to Fehr and Peers be disregarded for any but the most coarse-grained applications, and not used to guide any regional or local evacuation planning. My conclusions are based on a sub-region of their study – roughly corresponding to their Region 8 – on which two highly detailed professional studies by KLD Associates have already been carried out, and which differ in major particulars from the broad-brush strokes of the Fehr and Peers study.

Respectfully submitted,

Kevin Padian

Glen Ellen

[Experience: Before being a professor in biology for 40 years at Berkeley, I did a Masters’ Project on Fire Ecology. From 2016-2020 I was a Director of an East Bay community’s Fire Protection Board, where I led an effort to devise a Traffic Evacuation Study produced by UC Berkeley’s Institute for Transportation Studies. As a Board Member I implemented many of the recommendations of that study and founded an Emergency Preparedness Committee. With other residents I commissioned the KLD study of the NSV (SAFE Study), and was one of the principal residents working with KLD to produce the study. I continue to raise awareness about emergency evacuation problems in the Sonoma Valley region.]

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From: Pete Parkinson <pete.parkinson54@gmail.com>
Sent: Tuesday, April 29, 2025 11:12 AM
To: GeneralPlan
Subject: Comments On Draft Safety Element

EXTERNAL

Please consider the following comments, primarily related to wildfire safety issues:

1. As required by state law, the draft contains a Residential Egress Assessment that aims to identify residential areas having more than 30 dwellings with only a single access route. This assessment should have identified my neighborhood, Bennett Ridge (including Old Bennett Ridge, Bennett Ridge, Rollo and Bardy Roads--all County-maintained roads). This rural residential neighborhood contains approximately 135 parcels and has only one ingress/egress route connecting the neighborhood to Bennett Valley Road. Our neighborhood is entirely within the High and Very High Fire Hazard Severity Zones identified by CalFire.

Our neighborhood was heavily impacted by the Nuns Fire in 2017, with 75% of homes destroyed. Evacuation was problematic with several residents unable to get out due to fallen trees blocking roads leading to Bennett Valley Road.

2. I strongly support proposed policies SE-7a and SE-7e. Although SE-7e addresses ingress/egress routes specifically, I recommend strengthening SE-7a by explicitly including a lack of secondary access as one way that roads may not meet contemporary fire safety standards.

3. The County's Fire Code (Chapter 13A) is mentioned on page PS-23 and states that the code "provides for the removal of hazardous vegetation and combustible material on all unimproved parcels . . ." This significantly overstates the requirements of Chapter 13A, which only requires vegetation management on portions of unimproved properties that are within 10 feet of neighboring structures and/or roadway frontage. Every fire protection professional I have spoken with since the 2017 fires agrees a 10-foot clearance is helpful but not nearly enough. Policy SE-7h should be strengthened to call for improving Chapter 13A to mandate more effective vegetation management on unimproved and improved property.
4. Goal SE-8 calls for regulating new development to prevent unnecessary exposure ... [to] fire hazards." This is vitally important and an excellent goal. Proposed policies SE-8f and SE-8g are essential to meeting this goal. Policy SE-8f should be strengthened to apply in the High Fire Hazard Severity Zone as well.
5. As required under state law, the draft Safety Element includes an "AB 747" assessment of evacuation routes. This assessment, contained in Appendix B, is highly technical and detailed. Most Sonoma County residents (myself included) lack the technical expertise necessary to evaluate this assessment. But one thing is undeniable: Public concern about safe evacuation in an emergency and concern about the existing constraints on County roadways is growing exponentially. Evacuation safety is now a controversial issue for any significant development proposal. For this reason, I believe the draft Safety Element significantly underplays this issue. This is not merely a matter of technical compliance with the statute, but a matter of substantial public

interest that should be addressed more thoroughly in the Safety Element itself (not just in a technical appendix). Please consider these specific suggestions:

- The Safety Element should include a readable and non-technical summary of the evacuation assessment. This must include acknowledgement of the key conclusion of the assessment: "Sonoma County has limited options to manage evacuation demand during an emergency scenario."
- The assessment in Appendix B includes recommendations to address both evacuation "demand" and "supply" as well as policy. Many of these recommendations are operational in nature and not appropriate as General Plan policy, though some certainly are. The extent to which the recommendations in the assessment have been included (where appropriate) in the Safety Element policies is not readily apparent. In general, the policies in the SE should be clear enough to provide guidance to decision makers when making land use decisions that have the potential to impact emergency evacuation.
- While this draft Safety Element was being written, an advocacy group in Sonoma Valley commissioned its own study of evacuation scenarios. Again, I don't have the technical expertise to evaluate this study or its relationship to the assessment in Appendix B. However, it would be a mistake to pretend that this Sonoma Valley study has no impact on the draft Safety Element or on significant land use decisions going forward. Two things are apparent: 1) the new Sonoma Valley study arrives at conclusions that appear to be significantly different from those made previously by the County (i.e., in the EIR for the Sonoma Developmental Center), and 2) the situation in Sonoma Valley is not unique; these same evacuation constraints are apparent in many other areas within the County. The issue of evacuations will be raised increasingly in connection with future land use decisions and the Sonoma Valley study implies that the County's evaluation and judgment in these matters is not to be trusted. This will create tremendous problems for staff and decision makers.

I recommend that the County take this issue head-on. You've hired a very good consultant to do the AB 747 assessment; ask them to do an independent review of the Sonoma Valley study, including its methodology and conclusions. Show the public that the County takes this issue seriously, including a willingness to look critically at its own work.

Thank you for considering these comments.

Pete Parkinson, AICP
First District resident

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Katrina Braehmer

From: Kim Roberts-Gutzman <kgutzman@gmail.com>
Sent: Friday, March 28, 2025 7:31 PM
To: GeneralPlan
Subject: Environmental Justice and Safety Element Updates

EXTERNAL

Sonoma county

How many years before CANNABIS FUMES MIXED WITH AIR POLLUTION are destroying air quality? Denver is already there. A million people a year LEAVE CA. You are responsible, Lynda, Jimmy, David. Our property values are dropping, a mess. Do any of you know cannabis destroyers the Brian of young people? Wake up!

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Katrina Braehmer

From: Madeline Solomon <madelinesolomon60@gmail.com>
Sent: Thursday, April 24, 2025 12:21 PM
To: GeneralPlan
Subject: Draft Safety Element
Attachments: ada-safety-element-assessment-2020 (1).docx

EXTERNAL

Can you please provide me evidence that the Draft Safety Element meets the review criteria in the California Board of Forestry and Fire Protection Resource Protection Committee's Safety Element Assessment 2020 (attached below)?

After reviewing the Draft Safety Element in light of CA standards, best practices and Safety Elements from other Bay Area counties, I've concluded that the current Draft Safety Element does not meet the current standards.

Additionally, my recollection of the audit that Rincon conducted of the 2008 (?) Sonoma County General Plan identified several key issues that needed to be addressed in the current Revision. My reading of the Draft Safety Element suggests that those issues have not yet been successfully addressed and resolved by Permit Sonoma, the Planning Division and Rincon Consultants.

Therefore, I specifically request that the parties responsible for producing the Draft Safety Element provide direct evidence that the Draft fully meets the criteria required by the state of California for Safety Elements, as detailed in the document attached below.

If the responsible parties are unable to provide the direct evidence I request, I ask that this email correspondence please be included in the Public Comment materials that are part of the official record of Sonoma County.

On the chance that this email will indeed be included in the Public Comment materials that are part of the official record of the County of Sonoma, I would like to enter the comment that the Public Comment period for the Draft Safety Element was not announced properly in many places, including in email subscriber notifications from Permit Sonoma and from Sonoma County Supervisors Chair Lynda Hopkins, until most recently when the Public Comment period was already ~2/3 over. The problem was that while the opening of the Public Comment Period was announced, the closing date of that period wasn't announced until after I had lodged several (unanswered) queries and complaints with Permit Sonoma.

I make these requests in the interest of safety, resilience, disaster prevention and property and environmental protection, i.e. in partial fulfillment of my responsibility as an educated and aware resident and property owner in Sonoma County.

Both CalFire LNU and the CA State Fire Marshall's office independently advised me to make sure the problems about which I was consulting with them (in 2021-2023) were addressed and resolved when the Safety Element is updated -- the time is now, and I am still making my good faith attempt to fulfill the

responsibility that these CA state agencies advised me to take on as a private individual in order to help protect and support my community and my county during these challenging times.

Thank you,

Madeline Solomon (MSc, MA, CERT)
6794 Clara Lane
Forestville, CA 95436

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From: [GeneralPlan](#)
To: [Cynthia Strecker](#); [GeneralPlan](#)
Subject: RE: EnvironmentalJustice Element
Date: Wednesday, April 30, 2025 2:21:26 PM

Good Afternoon, Cynthia,

Thanks for the helpful feedback—these are great suggestions. We'll make sure to save your comments with the project file and keep them in mind as we move forward with the plan.

Thank you,
Claudette Diaz

-----Original Message-----

From: CYNTHIA STRECKER <cystrecker@yahoo.com>
Sent: Wednesday, April 23, 2025 12:47 PM
To: GeneralPlan <GeneralPlan@sonoma-county.org>
Subject: EnvironmentalJustice Element

EXTERNAL

Dear Katrina, I have one more suggestion for the General Plan. It's a little bit of both Environmental Justice and Safety element so you should decide where to put it.

My suggestion is that Sonoma Water or possibly Climate Resiliency should hire a full-time engineer whose specialty is small alternative systems. I know everyone has some experience with these systems but it's not necessarily extensive or up to date. Most engineers are well educated with respect to large gravity fed systems that are appropriate for cities in fairly level terrain (think communities along the 101 corridor).

However we are moving into a time when the state is requiring small communities served primarily by individual septic systems are being required to develop wastewater systems. This makes for a small ratepayer base and possibly in steep terrain. (Witness the number of lift stations involved in the Russian River Wastewater Treatment system as opposed to the Santa Rosa system). This means that a very different type of system is more appropriate for our large number of small communities. This would be best served by an engineer with both training and experience with alternative systems.

Thank you so much for considering my suggestion.

Cynthia Strecker
Sent from my iPad

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Katrina Braehmer

From: Cynthia Strecker <cstrecker.rivermac@gmail.com>
Sent: Tuesday, April 22, 2025 8:57 PM
To: GeneralPlan
Subject: Safety Element of the General Plan

EXTERNAL

I would like to make a suggestion for the General Plan.

I think that all new development, especially on hills in heavily forested areas only be permitted to occur on two-lane roads. It is simple common sense that if a fire occurs we need one lane for people to evacuate and another lane for fire trucks to simultaneously rush to the fire in order to fight it. Clearly this is absolutely necessary for public safety.

Thank you,
Cynthia Strecker

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Sonia E. Taylor
306 Lomitas Lane
Santa Rosa, CA 95404
707-579-8875
Great6@sonic.net

30 April 2025

Katrina Braehmer, Supervising Planner
Permit Sonoma

Via email

Re: Sonoma County General Plan Safety Element and Appendices

Dear Ms. Braehmer:

Thank you for the opportunity to comment on Sonoma County's draft Safety Element and the related appendices thereto. Following are my questions and comments.

GENERAL QUESTION

What sort of California Environmental Quality Act (CEQA) review will Sonoma County complete, if any, before adoption of both the Safety Element and the Environmental Justice Element? If there will be no CEQA review, please provide the reasons why not, including appropriate citations.

SAFETY ELEMENT POLICIES

Before my specific comments, I want to address the recommendations contained in the AB 747 assessment, which is Appendix B 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 121 of the Appendices pdf, 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.

2. Page 122 of the Appendices pdf, 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.

3. Page 122 of the Appendices pdf, 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 123 of the Appendices pdf, 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 7 of the pdf, Table 1: it’s stated that the Multi-Jurisdictional Hazard Mitigation Plan doesn’t address the safety issue of Sea Level Rise.

Why not?

3. Page 9 of the pdf, Section 1.2, bulleted list: Following are questions/comments about that list.
 - a. 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?
 - b. Third bullet point: While this bullet point states that the Safety Element is required to “avoid or minimize wildfire risk,” that’s not exactly complete. I request that this bullet point more accurately reflect the underlying law, which includes “Avoiding or minimizing

the wildfire hazards associated with new uses of land,” as well as for existing and planned development in State Responsibility Areas (SRAs) and in very high fire hazard severity zones (VHFSZ). The law also requires protection from the unreasonable risk of wildfire.

- c. Fourth bullet point: The phrase “minimize impact from new land uses” is incomplete – the “vulnerability assessment” required by law also requires identification of existing and planned development risk and development of feasible implementation measures, among other things. The current Safety Element language implies that this assessment is only relevant to new land uses, which I believe is incorrect.
4. Page 14 of the pdf, Section 2.1.2: 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.”

First, although this Safety Element section includes the word “Location” in the title, there is no further discussion of evacuation locations, other than on page 280 of the pdf in Appendix C, the SB 99 assessment, where three evacuation locations in the County are identified – the Petaluma Fairgrounds, the Santa Rosa Fairgrounds/Vet’s building and the Sonoma County Airport. I believe there must be some additional discussion of evacuation locations to comply with the law.

Second, the Safety Element AB 747 appendix identifies the capacity of the three selected scenarios, generally. 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.¹

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 15 of the pdf, Section 2.1.3: 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 Program².

¹ The one place the word “viable” appears is at page 280 of the 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.

² <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/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 C, 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 2021) identifies 98 (+/-) residential areas with only one egress route.³

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 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.⁴

6. Page 19 of the pdf, Policy SE-3k: 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.
7. Page 24 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.”

³ 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.

⁴ 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>

8. Page 25 of the pdf, Section 2.4: Add Diablo winds and other high winds that are common in Sonoma County, as they are a key component of our fire hazard.
9. Page 26 of the pdf, First incomplete paragraph: The new CalFire LRA FHSZ maps must be adopted by Sonoma County no later than late May. The County has no discretion about adopting those maps⁵, and in fact I believe that at least one Fire Department may have already accomplished that map adoption, but nonetheless, every necessary agency must adopt them by late May. In any event, given that Sonoma County has no ability to reject those maps, the Safety element must be updated immediately to evaluate all the new LRA FHSZs in all maps.
10. Page 26 of the pdf, Third full paragraph: I believe that state requirements for development in FHSZs has changed, and that there are state requirements now imposed on development in High Fire Hazard Severity Zones, as well as in VHFHSZs. Please update this section as appropriate.
11. Page 29 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.
12. Page 31 of the pdf, Figure 7: Update to include the 2025 LRA maps.
13. Page 32 of the pdf, Policy SE-7b: Again, I believe that state standards regarding development in FHSZs now includes requirements for building in High Fire Hazard Severity Zones. Please update.
14. Page 32 of the pdf, Policy SE-7e: Ironically, this policy incorporates the 98 (+/-) CalFire Subdivision Review Program residential developments with only one egress route, "in addition" to the 12 identified in the wholly inadequate SB 99 review in the Safety Element's appendix (only 5 of those 12 SB 99 identified residential developments are new – the remaining 7 were already identified by the CalFire Subdivision Review Program). In addition to supporting development of additional points of ingress/egress, this policy should be revised to also include supporting improvements to the existing single access roads and such other additional fire safety measures recommended as part of CalFire's Subdivision Review Program.
15. Page 32 of the pdf, Policy SE-7i: This policy should not be discretionary, but should be directive, such as "Enforce the Office of the State Fire Marshal requirements for fire safety."
16. Page 33 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.
17. Page 33 of the pdf, Policy SE-8c: I doubt it is possible to "achieve an acceptable level of risk" when talking about building in areas of the County subject to fire danger, and in fact I would

⁵ Sonoma County can increase the FHSZ for any LRA area in its jurisdiction with substantial evidence for all increases to VHFHSZ, and can also increase areas in its LRA to HFHSZ or MFHSZ. I have no evidence that the County is planning any such increases in FHSZ, but if that were to happen, obviously those increases would have to be considered in the Safety Element.

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 wildfire⁶, and second, there are no existing studies/evaluations by CalFire⁷ 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.”

18. Page 33 of the pdf, Policy SE-8f: I believe that this policy should be expanded to High Fire Hazard Severity Zones, as well.
19. Pages 33-34 of the pdf, Policy SE-8g: While this policy is good, it should be expanded and not limited to discretionary developments. Sonoma County is likely to be subjected to by right 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?

20. Page 34 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 should take advantage of First Street Foundation’s deep data to inform all their actions and

⁶ One such report is available at <https://fireecology.springeropen.com/articles/10.1186/s42408-021-00117-0> -- additional other reports are available.

⁷ See, LA Times article, <https://www.latimes.com/environment/story/2025-02-04/cal-fire-maps-did-not-predict-altadena>

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.

21. Page 36 of the pdf, Section 2.5.3, third paragraph: I have concerns about the future ability/willingness of the Federal Government to provide any assistance, standards, inspections and/or stewardship.
22. Page 37 of the pdf, second full paragraph: Again, Sonoma County should become a member of the First Street Foundation, which evaluates the risk not just for wildfire, but for flood, heat, air quality, wind and noise. See paragraph 20, above.
23. Page 41 of the pdf, Policy SD-10c: See paragraphs 20 and 22, above.
24. Page 42 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.
25. Page 43 of the pdf, Section 2.6, third paragraph: Please confirm that the seismic maps used by this Safety Element are those that were most recently updated, I believe in 2023-4.
26. Page 47, Figure 12: While the incorporated cities are not part of this Safety Element, I believe leaving them out of this map is unnecessary. As you can see, the hazard is identified in the very tiny County islands in Santa Rosa, so it's obvious that the information is available. Further this assessment is general, unlike that in the landslide map, so leaving the city hazards out of these maps makes no sense. All of the other seismic maps (except the landslide map) include the effect in the incorporated cities, making this map's omission of those cities even more curious.
27. Page 51 of the pdf, Policy SE-12d: This is a good policy. However, would it be possible to build a resource of the findings contained in all these reports? While I realize that there will likely be some copyright issues (alleged or real), or privacy issues, a compilation of those findings as they are discovered would be very informative.
28. Pages 51-52 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" this unacceptable behavior – it should be prohibited.
29. Page 53 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."
30. Page 54 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 residences (existing residential areas are partially covered in Policy SE-13k, but not new uses), health care facilities, parks, open spaces, etc.

31. Page 57 of the pdf, Policies SE-14b and SE-14f: Why isn't there an objective policy that prohibits development and redevelopment in areas vulnerable to sea level rise?
32. Pages 59-60 of the pdf, Figures 17 and 28: Given the very broad perimeters of these maps' information, it seems absurd not to include, at least broadly, information about the incorporated cities.
33. Page 61 of the pdf, Policy SE-15h: First, why is this policy only applicable to commercial 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.
34. Pages 65-71 of the pdf: See above comments that apply to these goals/programs.
35. Page 69 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."
36. Page 69 of the pdf, Goal SE-10, Programs 65 and 67: The word "should" must be replaced by "will." These should not be suggestive, but mandatory.
37. Page 69 of the pdf, Goal SE 11, Program 60: While I take the point of this Program, why isn't there a requirement that the rebuilding/redevelopment at least be flood resistant, or even better, be rebuilt/built to acceptable standards to prevent future flood damage?
38. Page 70, Goal SE-12, Program 62: For your reference, **this** is an objective, clear standard, which is how all of the policies/programs should be written to the extent possible.
39. Page 71, Goal SE-15, Program 77: See above comment about 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 18 of the pdf, Figure 3: Does this map include all General Plan amendments over the years since the adoption of the 2008 General Plan? If not, it should be corrected to include all those changes.
2. Page 27 of the pdf, Data Limitations, First Paragraph: As discussed previously in this letter, I believe that Sonoma County should become a member of the First Street Foundation (<https://firststreet.org/>), which is the only publicly available **risk** assessment organization, with modest fees for governmental organizations. Sonoma County should take advantage of First Street Foundation's deep data, which I believe includes information on future expected results from climate change.
3. Pages 31-32 of the pdf, Figures 6 and 7: Given the broad representations in these maps, it seems absurd to leave the incorporated cities out; I would suggest that they be added.

4. Page 36 of the pdf; Wildfire Infographic: As discussed earlier in this letter, this infographic should be redone to include the information in the CalFire LRA FHSZ maps, released in February, and which must be adopted as is – no discretion allowed – no later than May, 2025. 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, are a very large factor affecting wildfires.

5. Page 37 of the pdf, Figure 8: Must be updated to include the 2025 CalFire LRA maps. Again, as discussed earlier in this letter, 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.
6. Page 38 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.
7. Page 54 of the pdf, Figure 15: What is the date of these amounts?
8. Page 74 of the pdf, Figure 19: See comments, above, in this letter, including comment 5 directly above.
9. Page 87 of the pdf, Figure 19: See comments, above, in this letter, including comment 5 directly above.

SAFETY ELEMENT APPENDIX B QUESTIONS/COMMENTS

1. Page 110 of the pdf, 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.”

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 contexts⁸. There is no identification or evaluation of the safety and/or viability of any evacuation routes in any of the three selected scenarios, or in any way, at all.

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.

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 County⁹ (there are numerous city AB 747 assessments, but a county assessment is more likely to be comparable).

At page 110 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 111-112 of the pdf, last paragraph on page 111: 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 116 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, but the final Table (page 276 of the pdf) in this AB 747 assessment doesn't seem to support that alleged assumption.

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 112 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

⁸ The one place the word "viable" appears is at page 280 of the 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.

⁹ 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>

in the first half hour 60% of the people evacuating will have begun their evacuation, unlike the El 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 112 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 capacity¹⁰), 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.

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

6. Page 113 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

¹⁰ “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 114 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 114 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 115 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 116 of the pdf, Evacuation Traffic Section: Please confirm that in spite of this AB 747 assessment's selection of 4:30 pm on a Friday before a long weekend, this assessment does indeed assume that 100% of residents were present in their home and would have to evacuate, as well as all employees in the area in their single occupancy vehicles. Additionally, 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 117 of the pdf, Evacuation Demand Loading Window Section: Again, please provide the specific locations this AB 747 assessment is using as the "model gateways."
12. Page 118 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 119 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 route's 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 119-120, 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 120, Scenario 3 Section: Although the "blob" 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 122 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.
17. Page 124 of the pdf, Figure 1: This figure is unintelligible, and must be revised. First, each scenario's **actual** studied evacuation area must be outlined and identified as Scenario 1, 2 or 3. Second, inclusion of "blobs" that are much larger than the evacuation areas studied is misleading and those blobs should be deleted unless this AB 747 assessment will be revised to evaluate evacuation in all of the "blob" areas. Third, the meaning of the numbers 1-9 should be explained. Basically, this map is useless as is, and revision is necessary.
18. Pages 125-275, 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 276 of the pdf, Appendix A Unidentified Table: This AB 747 assessment assumes that each household evacuating will use 1.75 cars (I have the underlying study that developed that number if you'd like it). Further, this assessment assumes that 100% of households will be evacuating,

and that all employees in each evacuation area will be driving themselves out in a single occupancy vehicle/employee (page 119 of the pdf). This Table has the quantity of households and employees for each Scenario. However, this AB 747 assessment also assumes that there will be visitor/tourist traffic, which is why they selected 4:30 pm on the Friday before a holiday weekend to evaluate. The table does **not** quantify visitor/tourists who will also be required to evacuate, which must be corrected.

Even without visitor/tourist traffic, the alleged “Estimated Evacuation Demand (Number of Vehicles)” doesn’t add up. For example, for Scenario 1 Base (2019), 12,684 households at 1.75 vehicles/household should be evacuating, which adds up to 22,197 vehicles evacuating, and that doesn’t include any of the employee vehicles (or any possible visitor/tourist vehicles, let alone students, patients at hospitals, etc.). The number of vehicles evacuating in this Table for that Scenario is 20,811. Clearly there is a discrepancy.

This apparent error is perpetuated throughout this Table, and results in much lower numbers of estimated evacuation vehicles on the road.

Either this Table must be corrected to show accurately the number of estimated evacuation vehicles (and the entire AB 747 assessment redone based on the correct number of evacuation vehicles), or I will expect a complete, clear, detailed and explicit explanation of how this AB 747 assessment arrived at the estimated evacuation vehicles contained in this chart.

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.

SAFETY ELEMENT APPENDIX C QUESTIONS/COMMENTS

1. Page 279 of the pdf, SB 99 Approach Section: As discussed in my questions/comments to the Safety Element, #5, above, the approach taken by this SB 99 assessment is 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 279-280 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 280 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 280 of the pdf, bulleted list of “external gateways”: As discussed, above, 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 281 of the pdf, SB 99 Mapping Overview, Figure 1 description: As discussed, above, 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 no choice but to adopt those new LRA maps no later than May 2025 (and may have already started the process of adoption of same).
6. Page 282 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 284 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 285-296, 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.

This completes my comments to the updated Sonoma County Safety Element and its Appendices. I will appreciate answers to the questions I raise and will appreciate receiving the information I request. Thank you for your time and anticipated courtesy in this regard.

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

Sonoma County General Plan Environmental Justice and Safety Elements

I am Collin Thoma the Systems Change Advocate with Disability Services and Legal Center (DSLCC). We serve people with disabilities and seniors in Sonoma, Napa, Lake and Mendocino Counties. I have been involved in the General Plan process through the Equity Work Group Committee. I have appreciated the ability to provide input on the general plan since the early stages of the plan and have been happy the county has been receptive to the input. My comments today are to expand on that work to ensure the plan will be accessible and will benefit people with disabilities and seniors.

I will provide comments specific to both the Environmental Justice and Safety Elements but first I do have a couple of comments that apply to both elements. The county should work with Community Based Organizations and Non-Profits, to help achieve the goals in both elements. This will need to include providing both technical and financial support to these organizations so they can help achieve the goals of both elements. Providing support to these organizations is needed since the people they serve may be more receptive to working with the organization. Additionally, the county should peruse local, state and private funding to cover the financials of the goals for both elements. For the county to achieve it's language access as described in the Environmental Justice element it will be crucial to make it accessible to people with disabilities. Accessible information will need to be provided in both elements. Information will need to be presented in simple English or one's native language. Information that contains more complex or technical language makes it hard for some to understand. The county will need to do it's best to have hard copies of information available in large text. Printed information and signage will need to be in bold and large text so it's easy to read. Information that is sent or displayed electronically will also need to be in large and bold text with a contrasting background. Ideally electronic signs will also have a screen reader feature for those who need it.

Environmental Justice Element

All of the policies in EJ-3 are good to see, however, they will show they will be accessible to people with disabilities and seniors. This is needed since people with disabilities and seniors often face barriers to accessing parks and open space. The county should also make an effort to increase parks and open space in neighborhoods countywide. Additionally, policies or programs should be developed to eliminate the pay wall to access the parks and open space for low-income residents. Providing low cost, accessible, frequent and direct transportation to the

parks will be essential for those who don't or are unable to drive. The county should do its best to provide one-seat rides to parks and open space since some people with disabilities and seniors may have trouble managing multiple transfers.

A top priority will need to be to improve both fixed-route buses and paratransit services. For the fixed-route system improvements are to have more frequent and efficient buses. Paratransit needs significant improvements. There are larger portions of the county where residents live outside of the 0.75 mile of an active bus route to be eligible for paratransit. For people with disabilities and seniors who live outside of the service area it severely limits or eliminates their transportation options. Furthermore, the county's rapidly aging population will put more of a demand for accessible transportation. There are a few Community Based Organizations that can provide Transportation Network Connections (TNC) rides, however there are too few organizations to meet the demand. TNC rides provide a great alternative to those who are ineligible for paratransit or can't ride the fixed route bus. Furthermore, the organizations often have limited-service areas making it difficult to travel around the county. For example, it's very difficult to travel from the Sonoma Valley to Petaluma. The county should make an effort to help increase the number of organizations that can provide TNC rides. Assistance will also need to be provided to help organizations expand their service area. The county should study LumaGo which is a free on demand shuttle in downtown Petaluma. Since it started in the fall of 2024 it has had a very high usage amongst residents. Ideally the county would establish a similar mode of transportation in populated areas of the unincorporated county.

The county should make it a priority to expand its network of paved pathways that are separated from vehicle traffic. This is needed since these pathways are lacking countywide and provide a safe and accessible pathway for people with disabilities and seniors. While there are several dirt hiking trails for many, they are inaccessible. Furthermore, they may not feel comfortable or safe walking on sidewalks next to a busy road. Additionally, they may live or frequent an area that lacks sidewalks, or a complete sidewalk network. Closing these sidewalk gaps should be a top priority for the county. Additionally, increasing the number of buffered bike lanes is also needed. These buffered make it safer for those who may have a specially adapted bike that is lower to the ground. Providing accessible and safe places to walk or bike can help increase their physical activity and increase socialization. Both limited physical activity and social isolations amongst people with disabilities and seniors are significant concerns.

Increasing access to food as described in EJ-6 is good to see, however a policy should be created to include home delivery of food and premade meals. This is needed since there are a few organizations that provide these services. Home delivery of food and premade meals is needed for those who are homebound or have trouble accessing food markets. Policies 6a and 6b are great to see but should need to be implemented countywide. Both policies should be implemented countywide so people can access them where they live, work, socialize, take their children to school or go to school themselves.

The county should also include a policy in EJ-7 to increase rental assistance for low-income renters. This is needed given the ever-rising cost of both rents and the cost of living and is crucial to preventing homelessness. Furthermore, policies and programs should be developed to help people stay housed. This can include supportive living for those who are coming out of homelessness, are disabled, are a senior citizen. This is needed since they may need more assistance to stay housed and to avoid homelessness. The county should also expand implementation program eighteen to provide free smoke detectors and other items to make homes healthy and safe such as mold mitigation.

Safety Element

While I was glad to see organizations that help advise on how to prepare and deal with disasters such as Community Emergency Response & Training (CERT). There was no mention of the Sonoma County Access and Functional Needs (AFN) or the California Office of Emergency Services AFN committees. This is a major committee that needs to be included since the AFN is crucial to making sure disaster plans and assistance during disasters are accessible to people with disabilities and seniors. The county should provide assistance to low-income renters and homeowners in creating defensible space around their home. This will need to include financial assistance for renters/homeowners to complete these projects. Furthermore, the county should also provide a list of organizations that can do defensible space projects for those who are unable to complete the project themselves.

The county should conduct study the fire risk to neighborhoods that are close to areas that have extreme or high fire danger areas. This would be good to do since it has been common for wildfires to start in these areas and quickly spread to neighborhoods. The county should work with CBO'S and non-profits to develop a system to provide an advanced early warning system. This will be good to develop to give more time for residents who will need more time to

evacuate. Additionally, a database should be created to identify homes where first responders will physically need to go to the front door while doing high/low sirens during evacuations. This is needed since for those who may not have received the evacuation order. They may not have seen or heard the high/low sirens. First responders will also need to provide assistance to these residents if they are not able to self-evacuate. Furthermore, in general the county should be more aggressive with evacuations when there is a red flag event and/or fire weather. This is needed since it has been common for major fires to rapidly spread beyond the initial evacuation area. The county should make sure alerts or orders are sent via calls to landlines and cellphones in addition to texts and emails. This is since not all people with disabilities or seniors will use a cellphone. Instead, they may use a landline phone or email as ways to communicate. The county should also expand SE-5f to provide alternate forms of communication such as emergency radios. This is needed for those who lack or have unreliable access to mainstream forms of communications. The county should also consider adding sirens like those used for tornados to alert residents of evacuation orders.

It will be really important for the county to develop policies to provide transportation during evacuations for those who don't or are unable to drive. The lack of transportation during disasters is a significant need despite good improvements the county has made to its disaster response. Furthermore, evacuations shelters will need to be accessible for people with disabilities and seniors as this is a major need nationwide. This will need to include providing enough space for those with medical equipment or mobility devices. The county will need to develop policies and programs that are able to provide a quick recovery response for those are unable to hold out on their own for multiple days. I am glad the policy to provide backup power generators DSLC has a program that does this and has been very successful. However, this program does face restrictions, there is more demand than supply and there are stringent eligibility requirements. It would be good for the county to implement their own programs that aren't restricted by similar restrictions.

For extreme temperatures the county should include policies and programs to plant more trees and create natural shade. This will help reduce urban heat islands effects and will also help improve air quality. This will provide health benefits for those who may be more susceptible to extreme heat and/or pollution hazards. A top priority for the county will be to reduce the requirements for activation resilience centers during extreme weather events. The current requirements are way too strict and does not provide enough time to get the word out the centers

are open. Weather reports are accurate multiple days in advance that should allow for advanced notice of these centers. This is needed for Community based organizations and service providers to inform the people they serve of these centers will be open. Both those experiencing homelessness or live in housing that is vulnerable to extreme weather should be allowed to access these centers. They may be more vulnerable in mild temperatures such as mid 70 or mid 50s. Furthermore, extreme rain or wind events can also pose serious health and safety hazards. Centers should be activated even if the event will be for one or two days instead of the current three-day minimum. The county should designate more centers and provide transportation to these centers.

Thank you for taking the time to review my comments on the Environmental Justice and Safety Elements of the General plan. While I had a lot to say about the elements, it was to build upon the solid elements. My comments are also to ensure that people with disabilities and seniors will benefit from the goals of the elements. They can greatly benefit since many of the policies and programs in the elements can eliminate barriers they often face. I feel confident that if the county is able to establish good relationships with CBO's and non-profits it will be able to successfully achieve the goals of both elements.

Sincerely,
Collin Thoma
Systems Change Advocate
Disability Services & Legal Center (DSLCL)
521 Mendocino Avenue
Santa Rosa, CA 95401





filed via e-mail

April 30, 2025

Katrina Braehmer
Claudette Diaz
General Plan Project Managers
Permit Sonoma, County of Sonoma
2550 Ventura Ave.
Santa Rosa, Ca 95403

Re: Draft Safety Element Update

Dear Katrina and Claudette,

The Valley of the Moon Alliance (VOTMA) submits these preliminary comments on the Draft Safety Element Update (DSEU) recently circulated for comment. As an initial observation, VOTMA expresses our appreciation to you and your team for the level of thought, work and detail that is clearly reflected in the DSEU. The DSEU is comprehensive and clear and represents the planning process at its best. Thank you for that effort. The DSEU sets a solid standard going forward for assessing and mitigating, to the extent possible, the variety of natural and man-made hazards and associated risks to safety that confront the County and its residents.

While there is much to digest in the DSEU, at this point VOTMA will focus on wildfire hazards and risk in these brief comments. As the update process proceeds, we hope to broaden our lens to other topic areas. But for now, in the time available we have focused on the wildfire subject area that has been front and center for many of the residents of Sonoma Valley over the last 8 years.

Specifically, we are focused on the extent to which wildfire hazards and wildfire risk to safety and/or loss of property have been appropriately addressed in County in the land use planning and development approval process. Candidly, in reviewing the wildfire segment of the DSEU in comparison with that of the existing General Plan Safety Element, adopted in 2014, the latter was hardly adequate and was certainly not comprehensive.

The multiple wildfire incidents and the magnitude of those events in the intervening years certainly warrant expanded attention from both an operational (mitigation) perspective and a land use planning perspective.

The DSEU is certainly comprehensive as it relates to wildfire assessment. That said, VOTMA has the following observations and comments:

1. Increased Wildfire Occurrence and Intensity:

Both the text of the DSEU (PS:21-22) and Figure 6 (PS:26) indicate that expected wildfire occurrence and intensity is increasing with accelerate climate conditions. The 400,000 acres burned in the last 10 years (40,00/yr) is a stark memory. The DSEU indicates that we should expect an increased wildfire frequency and intensity into the end of the century. But the Climate change Vulnerability Assessment in Appendix A seems to tell a different story, with average burn acreage going from just 4,000 acres per year to 5700 acres/yr by mid-century and then 7500/yr by end of century, and the wildfire probability increasing from 10 % to 20% by mid-century and then staying flat through the end of the century. (Vulnerability Assessment (VA) at VA-29. This seems like two different stories—lower per year burn acreage than we have experienced over the last decade and a flat incident probability after the mid-century. Figure 6 of DSEU is the same as Figure 10 of VA.

As much as VOTMA would like to hope that the midcentury and end of century conditions will be the same, that does not seem likely. A reconciliation of the two discussions would be helpful. That leads into the next point.

2. Fire Hazard Zone Assessments vs Fire Risk Index

The discussion of the difference between “fire hazard” and “fire risk” on PS-23 seems significant from a planning perspective. That was not clear until the inputs for the “wildfire risk index” discussed in the VA were identified. VOTMA’s understanding of the difference between hazard and risk is that the “fire hazard” indicator is the unmitigated natural condition associated with fuels, topography, and weather. Fire risk on the other hand considers ember load and mitigation that has occurred but also factors in structure density (development density) and road network rank (road capacity and adequacy). See: Sonoma County Wildfire Risk Index (SCWRI) write up.

(<https://storymaps.arcgis.com/stories/c0783237c4244ac49838f8b7e9f54691>)

As the DSEU indicates, the current fire hazard framework is based on the “hazard” approach and not the “risk” approach. Understandably, from a firefighting perspective as applied by Cal Fire and local fire agencies focusing on the fire elements—fuel, topography, weather—that makes good sense. But from a fire safety perspective it seems debatable whether the “risk” perspective makes more sense. What is the ember load in the area (the leading edge of the fire), how many structures (density, and thus people) are involved, how good is the road capacity (for evacuation) in the area where the fire is moving and how well has the area pre-mitigated for fire risk? These are fire risk questions.

Yet it seems that at least for development planning purposes, as suggested in the DSEU, the “risk” approach is not what is being considered. Instead, Policies SE-8a and SE-8f operate to screen developments based on fire hazard severity zones and not the wildfire risk index of the specific area. As such, the project density and the conditions of the roadway network may not be explicitly/adequately factored into the fire safety review of a project. Any revision of the DSEU should consider the implications of that gap in information input. Perhaps there is a role for the SCWRI play in that situation?

3. A Revised DSEU Should Consider the KLD ETE Study for Sonoma Valley

VOTMA is in the process of reviewing the September 30, 2024, AB 747 Assessment conducted by Fehr & Peers (F&P) and included as Appendix B to the DSEU). That study (F&P study). contained a Scenario 3 analysis of an evacuation of part of Santa Rosa, part of Sonoma Mountain and of the Sonoma Valley. As you may be aware, VOTMA commissioned an Evacuation Time Estimate (ETE) study by KLS Associates (KLD) of a somewhat similar area (but excluding the City of Sonoma and only inferentially including a smaller part of east Santa Rosa). The KLS study was made publicly available in late January 2025. A link to the KLD study is provided here:

https://www.dropbox.com/scl/fi/uwgc0rw9ko6as04swc70y/KLD_TR_24-1462_Sonoma_Valley_Final_Report_01-28-25-v0.1.pdf?rlkey=h9fh5w7nd5y6221qxrotrfswp&e=1&st=k75olo3e&dl=0. VOTMA incorporates the KLD study into these comments by reference.

Although it appears that the F&P study and the KLD study have some differences in assumptions, both studies confirm what would be obvious to any Sonoma Valley resident who had to evacuate the Sonoma Valley one or more times in the last few years to flee oncoming wildfires—that the road network is currently woefully inadequate (lacks capacity) to facilitate a smooth, timely and efficient evacuation in the face of a significant wildfire of the severity of recent fires. Evacuation is persistently slow and measured in terms of multiple hours. The combination of an insufficient roadway network and significant resident/visitor density (with resulting high vehicle volume) presents an unacceptable risk that is increasingly apparent as the recent fires in southern California so vividly confirmed. That conclusion is consistent with the high wildfire risk index that a good part of Sonoma Valley seemingly reflects. See, Sonoma Valley as portrayed in the Sonoma County WildFire Risk Index:

<https://storymaps.arcgis.com/stories/c0783237c4244ac49838f8b7e9f54691>

VOTMA respectfully requests that Permit Sonoma, via the DSEU project team, consider the KLD study in any revision to the DSEU.

4. The DSEU Should Include Asbestos as a Form of Hazardous Materials in Evaluation of Risk.

VOTMA appreciate that the list of hazardous materials is lengthy, and that the regulatory and safety oversight of asbestos is commonly understood. But as infrastructure revitalization and housing turnover accelerate as sites and structures reach the point where large scale restoration and/or demolition becomes necessary, the Safety Element should contemplate the risk that such activities might affect large segments of the local population and thus need to be considered as part of the overall safety culture.

Conclusion

VOTMA appreciates the effort Permit Sonoma and the SEU project team has expended to develop the DSEU. The DSEU is a vast improvement to the existing 2014 Safety Element. It reflects that Sonoma County faces several significant and escalating safety risks, largely driven by natural factors, climate change, population growth and changes made to the natural environment in the ordinary course of living. The assessment of risks in the safety issue areas appear thorough and mitigations reflected in the Policy segments of the various safety issue areas are generally well constructed. VOTMA's comments are intended to address some gaps and potential inconsistencies relating to wildfire hazards and risks as explained in the text.

VOTMA appreciates the opportunity to comment at this draft stage and will follow this process, and comment as appropriate, as the DSEU, as revised, proceeds to the Planning Commission and the Board of Supervisors.

Respectfully submitted.

Roger Peters

Valley of the Moon Alliance

From: [Harry Clark](#)
To: [PlanningAgency](#)
Subject: General Plan Safety Element Update - GPA25-0001
Date: Wednesday, June 4, 2025 10:09:19 AM

EXTERNAL

Dear Members of the Planning Commission,

Thank you for taking on the effort to update the Safety Element of the Sonoma County General Plan. I have reviewed the documents provided by your office and have the following concerns that do not appear to be adequately addressed by the proposed update to the plan:

Safety Issue Areas and Policies:

Section 2.1.3 Residential Egress Assessment references a Residential Egress Assessment completed by the County to comply with Government Code Section 65302(g)(5) and includes a map that identifies residential developments of 30 or more parcels with only a single access route. The map provided identifies 12 housing developments throughout the county that have only one means of egress. As this map appears to overlook many developments that fall within this level of risk, including the community where I live on Giovanetti Rd in Forestville, it appears that this Assessment does not yet satisfy the requirements of Code Section 65302(g)(5). As it's also clear that these communities are particularly vulnerable in the event of a wildfire, there should be policies included in this section to prohibit development within a certain proximity to such communities if the proposed use involves highly flammable materials that would increase the risk of fire.

Flooding and Inundation:

The goal identified in SE-10 of section 2.5, defines a need to reduce the risk of damage, hazards and injuries that can be caused by flooding. Most of the policies that fall under that goal address the management of the floodplain with a focus on avoiding new development that is likely to be subject to repeated damage with each flood event. What is missing from this section is any acknowledgement that certain uses are grossly incompatible with flooding and that some uses, if flooded, will cause widespread and devastating damage both to the natural environment and the well-being of our community. This applies specifically to industrial uses that are located within a floodplain where the resulting contamination of the environment by sediment and/or other potential chemicals

and contaminants could affect large portions of our watershed. Any new proposals for locating such uses near a waterway should be prohibited. Again, these protections should be based on our understanding of the likely impact of climate change on the increased frequency and intensity of potential flooding.

Hazardous Materials:

Section 2.7 attempts to address policies to regulate the use, transportation and storage of hazardous materials. Policies SE-13i, 13j, and 13k appear to prohibit the use of hazardous materials within a certain proximity to schools or within any area designated for urban residential use, rural residential use or agricultural use, however, I'm not seeing any acknowledgement of floodplains or waterways in this section. As hazardous materials impose a far greater risk to the environment and the health of our communities once our waterways are impacted, these highly sensitive environments should be clearly protected. Policies should include the prohibition of any proposed use that requires hazardous materials within a reasonable (500 ft) setback from a stream or floodplain. These setbacks should be based on our understanding of the likely impact of climate change on the increased frequency and intensity of potential flooding.

Traffic:

While I understand that safety issues related to traffic are not currently part of the Safety Element, it seems reasonable to make some reference to the impact of traffic on the safety of our community. Land Use proposals that increase the intensity of truck traffic involving the hauling of hazardous materials should be a concern for all in our community. Such traffic should be prohibited within close proximity to schools, commercial corridors that support our communities, and bicycle routes that are important to our tourism economy and our quality of life as residents. Our state designated Scenic Highways also deserve special protections from any proposals that will have an increase on this type of traffic.

I recognize that the need to adopt an update to the Safety Element of our General Plan is far overdue, however, I believe these above concerns should be better addressed BEFORE officially approving the Amendment as drafted. Residents of Sonoma County deserve better protections.

**Thank you for considering these suggestions.
Respectfully,**

Harry Clark
6800 Giovanetti Road
Forestville, CA 95436

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From: [Roger Peters](#)
To: [PlanningAgency](#); [Shaun McCaffery](#); [Tim Freeman](#); [Pat Gilardi](#); [Chuck Striplen](#); [Eric Koenigshofer](#)
Cc: [Rebecca Hermosillo](#); [Tennis Wick](#); [Katrina Braehmer](#); [Valley of the Moon Alliance](#)
Subject: GPA25-0001 Safety Element-VOTMA comments
Date: Wednesday, June 4, 2025 4:19:22 PM
Attachments: [VOTMA dSEU dA comments 060425F.pdf](#)

EXTERNAL

Chair McCaffery and Commissioners,

Attached are the Valley of the Moon Alliance's late comments on the Safety Element scheduled for hearing tomorrow afternoon.

Roger Peters

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filed via e-mail

June 4, 2025

Sonoma County Planning Commission
Chair McCaffery
Commissioner Freeman
Commissioner Gilardi
Commissioner Striplen
Commissioner Koenigshofer
2550 Ventura Ave.
Santa Rosa, CA 95403
PlanningAgency@sonoma-county.org

Re: GPA25-0001: Sonoma County General Plan Safety Element Update

Dear Chair McCaffery and Commissioners,

The Valley of the Moon Alliance (VOTMA) submits these comments in advance of the June 5, 2025, Planning Commission (PC) hearing on the referenced Safety Element Update draft (dSEU) and associated draft Addendum (dA) prepared for CEQA compliance purposes. VOTMA identifies deficiencies in the dSEU and questions whether the use of the proposed dA to a now badly outdated 2008 Certified EIR is an appropriate or lawful vehicle for compliance with the County's CEQA obligations in this General Plan Element Update. The PC should reject Permit Sonoma's recommendation that the PC approve the dSEU and dA and not send it to the Board of Supervisors for final approval action. The dSEU in present form and without adequate CEQA review is not ready for final action by the Board.

1. The draft Safety Element Update Fails to Integrate the Effects and Impacts of the 2023 Housing Element Update into its Analysis.

California's General Plan process requires that after a Housing Element is updated that the Safety Element also be reviewed and updated to reflect the effects of the Housing Element update on issues required to be evaluated in the Safety Element. The dSEU fails to undertake any meaningful integration of the Housing Element 2023 update modifications on housing plans and programs into its assessment of potential short-and long-term risks to people, property, systems

and resources due to exposure to fires, floods and increasing climate change. Surprisingly, the dSEU fails to even mention the 2023 Housing Element Update. In view of the dramatic pressure the revised Regional Housing Needs Allocation exerted on the Housing Element 2023 update process and will continue to have on future planning for increased housing needs in Sonoma County, the absence of any integration of that housing pressure into the Safety Element Update is startling. The dSEU needs to clearly address the impacts on public safety resulting from adoption of the Housing Element update.

2. The draft Safety Element and the draft Addendum Do Not Adequately Address “Peak-Load Water Supply Requirements” for fire and geologic hazard purposes, as mandated by Government Code Section 65302(g)(1).

The horrific wildfires that destroyed Palisades and other areas of Southern California earlier this year brought attention to the adequacy (or lack thereof) of water supplies required to fight large urban and suburban fires, particularly in the face of increasing climate change. By law, a Safety Element is required to address “peak-load water requirements” for the relevant project areas covered by that Element. A “peakload water supply” is defined in the General Plan Guidelines, Appendix E, as “the supply of water available to meet both domestic water and fire fighting needs during a particular season and time of day when domestic water demand on a water system is at its peak.”

The draft Safety Element does address or reference the need to coordinate water supply adequacy for some hazards. Goals 8 and 9 and policies 8g, 8h, 9d and 9f do reference the need and requirement for adequate water supplies to address fire hazard suppression, among other hazard events (e.g., geologic). But those goals and policies do not constitute a water supply assessment and do not reflect a current evaluation of whether existing water supplies across the County are adequate to address the increasing risks of suburban and wild land fire and geologic hazards. Nor do they address what the impact on people, on the environment, and on natural and/or biological resources would be, were any additional demands for water supplies to be extracted from surface waters or groundwater located in the hazard areas.

Those are the questions that an updated EIR would have addressed. Had the Housing and Safety Element updates been combined, as seems to be the common practice, the resulting EIR could have addressed those issues which are now left hanging. The 2008 GP 2020 EIR addressed fire services and wildfire hazards in Section 4.9 and Impacts 4.9-9 and 4.9-10. However, the 2008 GP 2020 EIR does not appear to include a water supply assessment associated with the Safety Element considerations relating to the adequacy of peakload water supplies to respond to wildfire hazards. Master Response S (EIR Vol 2 at 2.147 to 2.153) did address “Water Supply” but does not address whether there was an adequate water supply to respond to wildfires.

So, 17 years ago, the full EIR did not answer the question whether there was an adequate water supply in the County to respond to serious wildfire hazards. The current draft Addendum does not advance that ball one inch, despite the fact that

the demonstrated and lived wildfire hazards over that time period cry out for some assessment today of whether this County is ready to effectively respond with an adequate water supply to the wildfire hazards ahead that are all too real. Permit Sonoma should be required to arrange for a Sonoma County water supply assessment to answer that question as part of an EIR that updates the 2008 EIR for this issue.

3. In light of continuing wild land fire hazard risk increases associated with ongoing climate change, Policy SE-8f should be revised to read that “In Very High Fire Risk Zones and in High Fire Risk Zones Immediately Adjacent to Very High Fire Risk Zones, avoid new residential development and new or expanded commercial or industrial development...that could place large numbers of occupants at unreasonable risk of wildfire. ~~where feasible~~”

Frankly, the Safety Element should provide that in both Very High and High fire risk zones new residential and commercial/industrial development should be precluded. Recognizing that hard absolutes are disfavored in the planning process, VOTMA recommends that the Safety Element at least take the first step to move slightly more toward precluding development in high risk areas entirely by suggesting that for now the preclusion only be extended to apply to high fire risk zones that are *immediately adjacent* to very high fire risk zones.

The fire risks experienced over the last 9 years in various locations in Sonoma County and specifically in Sonoma Valley more than justify this small step. The deletion of the “where feasible” qualifier is intended to simply to eliminate the debate over what the term “feasible” means. Presumably a procedure to seek and obtain a waiver of the absolute prohibition for good cause shown could also be enacted.

4. Policy SE-8h should be modified to track the Safety Element Guidelines to read “Require all new development to have adequate water supply to meet fire suppression needs ~~all peak load water supply requirements and~~ comply with applicable fire flow requirements.

This modification will ensure that in tracking water supply requirements in the permitting process applicants will be aligned with the terminology utilized by the State for statutory and CEQA compliance purposes.

5. Appendix C to the draft Safety Element should be revised to reflect fire evacuation zone-based Evacuation Scenarios, and should report evacuation clearance results on a volume-to-capacity basis that is much closer to full clearance (.00) than reflected by .75 (25% clearance)

VOTMA appreciates that Permit Sonoma has commissioned the Fehr & Peers (F&P) firm to assist in evaluating modeled evacuation time analysis for wildfire and other hazard situations where evacuation might be required. As F&P noted, its study is not at a detail level that would be expected for a project EIR. But the study does look at actual project areas, as it were. For reasons not entirely clear,

the F&P study did not use established evacuation zones for its scenario analysis and does not entirely frame the scale of the evacuation areas by including specific shadow zone evacuation as well.

Based on its work with KLD Associates to produce the Sonoma Valley ETE study referenced in VOTMA's prior comments in the proceeding, we understand that there are various assumptions that are required for these studies, absent data collected from the community to better understand what their evacuation situations and patterns might suggest. KLD did collect that data; F&P did not and had to make various assumptions. For example, F&P appears to have assumed that all evacuations from a residence would be in one car; KLS had a more nuanced estimate. Those sorts of assumptions, like the one car example and the mobilization time assumptions F&P used (60% of residents fully mobilized within 30 minutes) would have potentially significant impacts on the resultant ETE analysis. Given those various floating assumption issues, among others, the F&P study results are at best approximations that provide a broad understanding of evacuation time estimates. This effort would have been better informed had PS viewed the AB 474 responsibility for Safety Element purposes as requiring an EIR level of specificity.

Given the limitations of what the study can fairly be said to address for purposes of satisfying AB747 there is one issue about the study results that deserves highlighting. That relates to the target level of volume-to-capacity clearance that needs to be achieved to be able to represent that for critical fire safety purposes the area has been evacuated. KLD presented its results based on a 90-100% evacuation status. That would represent a .10 or less volume (cars still on the road) to capacity (capacity of road to accept cars). In contrast, F&P used a .75 or less V to C marker as a green or open road status for an acceptable state for evacuation.

Obviously under the F&P reported situation there were still plenty of cars on the road when the situation was characterized as a green light for purposes of evacuation completion. That level of residual evacuation traffic does not on its face suggest that the evacuation routes studied were either safe or viable at the times reported by F&P. The F&P study should be clarified to provide more granularity on the time path from .75 V2C to .10 V2C in the various areas. What impact does that have on F&P's total evacuation times?

AB 747 (Government Code 65302.15) requires cities and counties to provide much needed information in their next Safety Element and associated CEQA documents on the capacity, safety and viability of evacuation routes. The F&P study does address capacity, with qualifications as noted. It's not clear that the F&P study addresses broader safety and viability issues.

6. The passage of time from the 2008 EIR for the last Safety Element Update and the magnitude of the Wildfire impacts in Sonoma County during the intervening 18 years warrant a new EIR to support the draft Safety Element.

The 2008 EIR adopted in connection with GP 2020 is now badly outdated. Permit Sonoma's attempt to continue to use that stale 2008 EIR as the linchpin of this Safety Element for CEQA compliance purposes should be declined. Basing a current assessment of the safety status of the County on a dated document ignores the trauma and changed circumstances relating to hazards that Sonoma County residents have endured and been confronted with over the last 17 years.

Sections 4 and 5 of the dAddendum outline Permit Sonoma's findings and basis for determining that a new EIR or other modification to the 2008 EIR are not warranted. That discussion addresses CEQA Guideline 15162 and affirmatively states that among other findings there are "no substantial changes in the circumstances under which the updated project will be undertaken, that will require major revisions to the [2008] to the GP2020 EIR due to the involvement of...a substantial increase in the severity of previously identified significant effects." dA at 60. VOTMA questions that determination.

The project here is how to plan and implement actions, regulations and activities designed to protect people, property, systems and resources from short-and long-term risks due to exposure to fire, floods and increased climate changes, among other hazards. Water supply availability is a key factor in addressing the risks and impacts of suburban and wild land fires. A current water supply assessment for Sonoma County should be a key element of any EIR prepared as a Safety Element Update for Sonoma County. Among other things, that supply assessment would be relevant to assessing the impact on the environment (water sources, wildlife, etc.) as well as the safety of people. Policy 8 SE-8h, which, as now written (see pt 4 above), would "Require all new development to have adequate water supplies to meet fire suppression needs and comply with applicable fire flow requirements."

Permit Sonoma's refrain that the GP2020 EIR satisfies CEQA both ignores the stale nature of any water supply assessment done in 2008, and fails to address how both fire risk and water availability have changed over time, with fire risk going up and water availability more challenging.

Quite apart from time impacts, it bears mentioning that it was not until December 28, 2018, that CEQA was modified to explicitly include wildfire review in its guidelines via amendment to Appendix G. What may now be a given in the context of the recent past fire experience in Sonoma County, in 2008 wildfire was not yet top of mind for purposes of EIR analysis.

That recent experience in Sonoma County is precisely the type of situation in which Guideline 15162(a)(2)'s reference to opening the door to new EIRs are

warranted-- where “substantial changes occur with respect to the circumstances under which the project is undertaken...due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified environmental effects.” As much as PS would like to rely on the 2008 EIR, a more current EIR is warranted here.

Thank you for the opportunity to comment.

Regards,

Roger Peters

Valley of the Moon Alliance

Cc: Supervisor Rebecca Hermosillo
PS Director Tennis Wick
Katrina Brachmer

Subject: FW: late comments for today's Safety Element PC meeting
Date: Thursday, June 5, 2025 8:21:53 AM
Attachments: [Fire evac Safety Element 625.docx](#)
[Safety Element comment 6525.docx](#)

From: Fred Allebach <fallebach@gmail.com>
Sent: Thursday, June 5, 2025 8:11 AM
To: Katrina Braehmer <Katrina.Braehmer@sonoma-county.org>
Subject: late comments for today's Safety Element PC meeting

EXTERNAL

Hi Katrina,
Here are a few late Safety Element comments,
hopefully they can be forwarded to PC members.
best, Fred

"We don't know where we're going but we have to stick together in case somebody gets there." Ken Kesey

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Fred Allebach

6/5/25

An alternate view of fire evacuation risks

For many years, neighborhood groups in Sonoma County have resisted land use changes in every possible way. Fire evacuation fear is the latest thing, especially from mountain-front, low-density areas. While fire risk is real we now see it applied to support a prior no-changes agenda.

Despite natural hazards and risks, Sonoma County has cities and 12 urban service areas with municipal water and sewer service. This is where development is supposed to go. These urban service areas are not greenbelt or wildlands. For example, the SDC project in Sonoma Valley and the Springs Specific Plan are all in the valley's urban service area.

Urban service areas have *higher resource opportunity areas* where integration with lower income housing is supposed to go, according to state Affirmatively Furthering Fair Housing (AFFH) law. Sonoma Mountain foothills, Glen Ellen, Mayacamas, Annadel area, and Rincon Valley are TCAC higher resource opportunity areas. The SDC site is where 200-plus 100% affordable inclusionary housing units and "affordable by design" units could be built. The above-noted lower density, foothills areas are fighting hard to prevent denser land uses known to be associated with a measure of integration. Without density and an economy of scale, affordable housing can't be produced.

Resistance to density is a problem, especially when urban growth boundary and community separator land use measures passed on the promise of more "smart growth" and denser infill in the city and in the valley urban service area. Affirmatively Furthering Fair Housing and fire evac planning are in tension.

Higher resource areas like Sonoma's east side for example, have systematically blocked upzoning and in fact, *only one* low-income housing unit will go on the city's east side for the whole 6th cycle Housing Element. Glen Ellen has a similar pattern where a proposal to modestly upzone one parcel downtown met with vigorous resistance that it would destroy the town's character. What we have is a situation where environmental protection and neighborhood character arguments are eclipsing valley social equity needs and the need for more housing in general. This is a suburban policy and values blind spot that leads to an impossible situation, to a Green Checkmate where pretty much *nothing* is allowed in existing residential areas. To the powers that be, the underutilized space inherent in low-density zoning is off limits to change; there's no room at the inn.

This is the exact same case made by Ezra Kellin in his new book *Abundance*; this is why the Left has lost the working class: too much exclusion based on CEQA abuse and environmental protection arguments.

Fire evac is the new no-changes, perfect storm NIMBY trump card.

However, according to California Department of Housing and Community Development, "Addressing disaster risk is not a justification for furthering segregation, and policies that seek to address this risk should include strategies that mitigate the risk of displacement and exclusion. In this analysis, jurisdictions should make note of potential impacts of disasters on protected classes and low-income residents, particularly low-income renter populations. Research has shown that low-income renter populations are disproportionately exposed to environmental hazards and that housing tenure is a telling determinant of social vulnerability to disasters."

SDC, Donald Street, Springs Specific Plan, and Sonoma east side neighbors all want to limit housing development to a scale where it can never be affordable. *Smart growth* planning principles are invoked by Greens to put the onus all on Sonoma to take valley dense infill. Yet Sonoma, at 75% single family homes and 70% single family zoning, is not leading the way on dense infill. Sonoma is up against its own Affirmatively Furthering Fair Housing troubles with 6th cycle Housing Element plans that concentrates poverty on the poorest, westside of town and concentrates wealth to the north and the east.

The same can be said for Santa Rosa where Hwy 101 is a hard line separating class and race.

Inequitable local land use policy counter to Affirmatively Furthering Fair Housing has already concentrated poverty on the unincorporated Springs Hwy 12 corridor and will continue to squeeze low-income residents out of the whole valley by constricting land use and driving up prices. Sonoma Valley and other SoCo nice, foothills/ wooded, urbanized areas are becoming more and more exclusive and more segregated, as noted in the Sonoma Housing Element.

With the potential creation of a Sonoma Mountain Community Services District west of Arnold Drive, the lowest-income people the valley in the Springs will be even further isolated from the wealthiest. This would lock in the Green Checkmate as Sonoma Valley's default land use policy. Foothills folk also want to hamstring the Springs Specific Plan to cripple needed dense infill.

In my opinion, SoCo valley floor residents, renters in particular, should not be forced to subsidize an elite, pastoral, lifestyle where fire evac fears takes precedence over Affirmatively Furthering Fair Housing. That's an inequitable, feudal stasis. Foothills and mountain front life and its fire risks are choices those residents have made. Low density, exclusionary zoning is also a choice and not an immutable fact. It's not right that low-density zoned neighborhoods and fire-risky foothill compounds act to prevent dense infill in the valley floor urban service area where it should be. Inclusionary Affirmatively Furthering Fair Housing principles need equal time with exclusionary themes of which fire evac has now taken its place.

The first fire evac safety step for all valley residents is to punch through all possible access and egress roads where they are now blocked or constrained. If people are concerned to evacuate faster, all blocked egress paths (Siesta Way, 4th and 5th Streets West) need to be opened up, even if it means a loss of neighborhood exclusivity. Second step, trim back all trees and brush 50' from roads; make roads safe for all.

Another way Sonoma Valley can foster quicker fire evac is to widen and improve major transportation arteries. Under-developed 1960's-level streets and roads cause traffic problems, and bigger arteries are needed to evacuate properly. This then crashes into more Green Checkmate resistance; more modern roads will compromise the hoped-for Sleepy Hollow Stasis where nothing changes.

With the Bay Area, SoCo, and Sonoma Valley being desirable, high-amenity areas, and climate migration being a salient world issue, this is no time for Bay Area Blue folks to build a wall and be like Trump who said that Affirmatively Furthering Fair Housing would "destroy the suburbs." Blue cohorts are generally strong immigrant supporters. For blue people, now is a time to be welcoming and to make room at the inn. If we are a top Blue area in the US, let's show it for social equity too.

At the end of the day, the interface of fire evac planning and Affirmatively Furthering Fair Housing calls for strategies that balance and address risks and fair and inclusive land use policy. The whole County should not have to succumb to land use that privileges an elite few.

Fred Allebach

6/5/25

Sonoma County Community Wildfire Protection Plan (CWPP) public comment, same applies to the SoCo Safety Element

My main concern with this fire hazard plan is it will be weaponized (like drought and water) against the very real and pressing need for more housing regionally, and particularly more affordable housing. There is enough NIMBYism already and I hope fire disaster planning doesn't become one more arrow in that quiver.

What we need in our planning is to make room for all community members, not figure out ways to limit community membership that then have an effect of furthering exclusivity.

Affirmatively Furthering Fair Housing (AFFH), or AB 686, is a state law signed in 2018
https://hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

Here is a quote from the state Housing and Community Development agency concerning AFFH: **“Addressing disaster risk is not a justification for furthering segregation, and policies that seek to address this risk should include strategies that mitigate the risk of displacement and exclusion.** In this analysis, jurisdictions should make note of potential impacts of disasters on protected classes and low-income residents, particularly low-income renter populations. Research has shown that low-income renter populations are disproportionately exposed to environmental hazards and that housing tenure is a telling determinant of social vulnerability to disasters.”

We know that the Great Recession, past fire disasters, and Covid-19 have disproportionately impacted the lowest economic tiers, which happen to also be mostly Latino immigrants. Plans to prevent future fire problems should not in any way add to this already heavy burden.

Are our plans, monies, and resources in this CWPP centered around protecting a minority of homes in areas where they should not even be, like homes right on the beach in hurricane alley? If people are free to build wherever, and most of the county is vulnerable to wind-assisted ember-caused fire anyway, where to put the most fire protection resources? I say equal resources in areas with the highest, densest, multi-unit housing populations.

Tenants always get the worst deal from aggregate public policy. Please don't continue that trend with this CWPP.

AB 686 clearly applies to CWPP planning and to all agencies and their impacts on AFFH, even if these agencies and jurisdictions are not specifically in planning and housing. It will be worth it to have county, city, and Special District attorneys review the developing and final CWPP to make sure it is congruent with AFFH state law.

One person's protection and preservation is another's exclusion. Low-income, people of color, and protected classes have already been displaced by unfair housing policies and had many systemic "takings." Adding fire disaster risk to the list of exclusionary rationales in this CWPP should be avoided by policy and decision makers.

Take home point: with clear and demonstrable inequity and segregation in Sonoma County and Sonoma Valley, this CWPP needs to ensure that "addressing disaster risk is not a justification for furthering segregation." AFFH and climate justice are planning trajectories that call to be integrated into all policy. Please make sure you do so with this CWPP.

<https://sonomacounty.ca.gov/PRMD/Fire-Prevention/Community-Wildfire-Protection-Plan/>

Subject: FW: June 5, 2025 Planning Commission Hearing -- Safety Element
Date: Thursday, June 5, 2025 8:26:15 AM
Attachments: [6 4 25 taylor safety element comments final 1 final.pdf](#)

-----Original Message-----

From: Sonia Taylor <great6@sonic.net>
Sent: Wednesday, June 4, 2025 5:50 PM
To: Shaun McCaffery <Shaun.McCaffery@sonoma-county.org>; Tim Freeman <Tim.Freeman@sonoma-county.org>; Pat Gilardi <Pat.Gilardi@sonoma-county.org>; Eric Koenigshofer <Eric.Koenigshofer@sonoma-county.org>; Chuck Striplen <Chuck.Striplen@sonoma-county.org>
Cc: Tennis Wick <Tennis.Wick@sonoma-county.org>; Scott Orr <Scott.Orr@sonoma-county.org>; Katrina Braehmer <Katrina.Braehmer@sonoma-county.org>
Subject: Re: June 5, 2025 Planning Commission Hearing -- Safety Element

EXTERNAL

Chair McCaffery and Members of the Sonoma County Planning Commission:

Attached please find my letter regarding your consideration of the Safety Element, the Safety Element Appendices, and the Addendum to the General Plan EIR on tomorrow's Planning Commission agenda.

Please don't hesitate to call if you have any questions or would like additional information.

Sonia

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

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.

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4 June 2025

Shaun McCaffery, Chair
Tim Freeman
Patricia Gilardi
Eric Koenigshofer
Charles J. Striplen
Sonoma County Planning Commission

Via email

Re: Sonoma County General Plan Safety Element and Appendices
Planning Commission Hearing, 6/5/25, Item 1

Chair McCaffery and Members of the Sonoma County Planning Commission:

Thank you for the opportunity to comment on Sonoma County's draft Safety Element and the related appendices thereto.

I 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 Thursday, June 5th.

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.

With regard to compliance with AB 747/AB 1409, the Safety Element added Policy SE-2i, 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, the Hazard Mitigation Plan and/or the Emergency Operations Plan with no date certain for any 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 achieved, 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, as follows:

4. 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.

5. 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.

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.

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 Program¹, identifies **98 +/-** residential development locations in Sonoma County with only one egress route.²

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. 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.³

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.

¹ <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/subdivision-review-program>

² My April 30, 2025 letter regarding the Safety Element identified another 3 residential developments with only one egress route.

³ This is one of the shortest laws ever. See 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 analysis, page 129 of the Safety Element Appendices pdf)

Since none of the underlying documentation is available to evaluate this evacuation analysis, we are 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 numbers in this table must add up.

Unfortunately, they don't.

The table, below, is from this AB 747 evacuation analysis, at page 296 of the Safety Element Appendices.

Appendix A: Estimated Evacuation Demand

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

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

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

- This evacuation analysis assumes that **100% of households** within each evacuation area will evacuate using their personal vehicle,
- That households with more than one vehicle will likely not use all their vehicles during an evacuation,
- That a post evacuation survey of Santa Rosa residents evacuating during the Tubbs fire showing an **average of 1.75 vehicles were used per household**,
- It is assumed that **all workers** within each selected evacuation area drove to work alone and **will also evacuate using one personal vehicle per worker**, and

- That there will be background traffic on evacuation routes beyond what might be expected, which is vacation traffic given the fact that the analysis assumes the evacuations will take place at 4:30 pm on a Friday before a holiday weekend.

(Pages 3 and 8 of the analysis, page 132 and 136 of the Safety Element Appendices pdf)

Evaluating the Appendix A table is simple math: the number of households multiplied by 1.75 vehicles/household plus the number of employees multiplied by 1 vehicle/worker should equal the estimated number of vehicles evacuating. Unfortunately there is no ability in this table to evaluate the amount of additional tourist traffic that might also be on the roads during the evacuations, because that information simply isn't provided. Nonetheless, simple math should suffice to determine whether this evacuation analysis is at least an accurate start to evaluating the capacity of the three evacuation scenarios.

Again, the numbers don't add up. My apologies for subjecting you to math, but it's necessary to understand just what is wrong with this table. See the examples, below:

Scenario 1 Base (2019): $12,684 \text{ households} \times 1.75 \text{ vehicles} = 22,197 \text{ vehicles} + 7,293 \text{ workers} \times 1 \text{ vehicle} = 7,293 \text{ vehicles} = 29,490 \text{ total vehicles}$. The chart shows only 20,811 vehicles evacuating in this scenario, a shortage of 8,679 vehicles. To look at it another way, start with the $7,293 \text{ workers} \times 1 \text{ vehicle} = 7,293 \text{ vehicles}$. Subtract those 7,293 vehicles from their estimate of 20,811 total vehicles and you are left with 13,518 vehicles to be divided up between 12,684 households, which would mean that each household evacuated using only 1.07 vehicles/household. Given that almost 51% of the households have 2 or more vehicles, the assumption that they would only use just over 1 vehicle/household to evacuate is a joke.

Scenario 3 Future (2040): $43,244 \text{ households} \times 1.75 \text{ vehicles} = 75,677 \text{ vehicles} + 37,142 \text{ workers} \times 1 \text{ vehicle} = 37,142 \text{ vehicles} = 112,819 \text{ total vehicles}$. The chart shows only 69,878 vehicles evacuating in this scenario, a shortage of 42,941 vehicles. To look at it another way, start with the $37,142 \text{ workers} \times 1 \text{ vehicle} = 37,142 \text{ vehicles}$. Subtract those 37,142 vehicles from their estimate of 69,878 total vehicles and you are left with 32,736 vehicles to be divided up between 43,244 households, which would mean that each household evacuated using only .76 vehicles/household. This is even a bigger joke, given that 60% of the households have 2 or more vehicles.

Or, let's just leave the workers out of the equation. Let's assume they all just run for their lives instead of driving.

Scenario 2 Base (2109): $8,627 \text{ households} \times 1.75 \text{ vehicles} = 15,097 \text{ total vehicles}$. The chart shows only 14,695 vehicles evacuating in this scenario, a shortage of 402 vehicles, and that's with NO worker evacuation vehicles (or alleged tourist traffic).

The numbers just don't add up, in any scenario, in any way of crunching the numbers (and don't include any of the alleged tourist traffic). This entire evaluation of the capacity of the selected evacuation routes relies on the estimated number of vehicles evacuating, and since the only numbers provided don't add up, this capacity identification cannot stand. Therefore, this AB 747 evacuation assessment is faulty.

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.⁴

This AB 747 Evacuation Assessment does not fulfill the requirements of Govt. Code §65302.15, and is therefore legally defective.

It is unclear why this AB 747/AB 1409 Assessment is wholly inadequate – I provide detailed comments about this assessment in the body of my letter below, but **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 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 B 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 141 of the Appendices pdf, 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.

⁴ 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 (page 111 of pdf), 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.

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)

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. Sonoma County will soon be subject to all State housing streamlining ordinances that remove all discretionary decision making (we won't be meeting our RHNA), 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 142 of the Appendices pdf, 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 (See, <https://www.shilohresortenvironmental.com/eis/>, Appendix N)
3. Page 142 of the Appendices pdf, 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 143 of the Appendices pdf, 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 2021) identifies 98 (+/-) residential areas with only one egress route.⁵

⁵ 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

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 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.⁶

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. 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.

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

the total number of residential areas of more than 30 dwelling units with only one egress route may be higher than 98.

⁶ 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>

nondiscretionary development that occurs in County areas in all FHSZs and in areas who have experienced fires in the past.

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 wildfire⁷, and second, there are no existing studies/evaluations by CalFire⁸ 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 near 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?

⁷ One such report is available at <https://fireecology.springeropen.com/articles/10.1186/s42408-021-00117-0> -- additional other reports are available.

⁸ See, LA Times article, <https://www.latimes.com/environment/story/2025-02-04/cal-fire-maps-did-not-predict-altadena>

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 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" this unacceptable behavior – it should be prohibited.
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 residences (existing residential areas are partially covered in Policy SE-13k, but not new uses), 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 parking lots, and this Program must be amended to at least include the new requirement that this applies to "industrial" uses.

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 36 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 must be adopted as is – no discretion allowed – no later than May, 2025. 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 37 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 38 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 74 of the pdf, Figure 19: See comments, above, in this letter, including comment 2 directly above.
5. Page 87 of the pdf, Figure 22: See comments, above, in this letter, including comment 2 directly above.

SAFETY ELEMENT APPENDIX B QUESTIONS/COMMENTS

1. Page 110 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 110-111 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 111 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 111 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 112 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 no choice but to adopt those new LRA maps no later than May 2025.
6. Page 113 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 115 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 116-127, 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

1. Page 130 of the pdf, 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."

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 contexts⁹. There is no identification or evaluation of the safety and/or viability of any evacuation routes in any of the three selected scenarios, or in any way, at all.

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.

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 County¹⁰ (there are numerous city AB 747 assessments, but a county assessment is more likely to be comparable).

At page 130 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 131-132 of the pdf, last paragraph on page 131: 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 136 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, but the final Table (page 296 of the pdf) in this AB 747 assessment doesn't support that alleged assumption.

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 132 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

⁹ 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.

¹⁰ 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>

in the first half hour 60% of the people evacuating will have begun their evacuation, unlike the El 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 132 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 capacity¹¹), 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.

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

6. Page 133 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

¹¹ “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 134 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 134 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 135 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 136 of the pdf, Evacuation Traffic Section: Please confirm that in spite of this AB 747 assessment's selection of 4:30 pm on a Friday before a long weekend, this assessment does indeed assume that 100% of residents were present in their home and would have to evacuate, as well as all employees in the area in their single occupancy vehicles. Additionally, 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 137 of the pdf, Evacuation Demand Loading Window Section: Again, please provide the specific locations this AB 747 assessment is using as the "model gateways."
12. Page 138 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 139 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 route's 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 139-140, 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 140, 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 142 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.
17. Pages 145-295, Maps: A legend explaining what the colors/line widths on each map mean must appear on each map. As is, these maps are unintelligible.
18. Page 296 of the pdf, Appendix A Unidentified Table: As discussed early in this letter, this Table provides the only information that can be used to evaluate the reliability of this AB 747 Assessment, and basic math shows that this Table fails to accurately state the number of estimated evacuation vehicles. If this Table uses some assumptions that are not disclosed in the AB 747 Assessment that explains the discrepancies in this Table, please provide a complete, clear, detailed and explicit explanation of how this AB 747 assessment arrived at the estimated evacuation vehicles contained in this chart.

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. Please require that both of those Assessments be redone to be compliant, that the Safety Element and the Addendum to the General Plan EIR be revised as necessary, before returning them to the Planning Commission 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

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EXTERNAL

Please forward these comments to the Planning Commission and appropriate staff.

Thank you for some of the revisions to the draft element in response to my earlier comments. I still have some concerns and suggestions for the Commission.

1. Although you are correct that the draft element does not include any policies that would restrict affordable housing projects from designated EJ communities, my concern is that the designations will still be used by project opponents to argue that the projects would exacerbate EJ issues in these areas. I would suggest a policy be added to Section EJ-1 that would make it clear that the EJ designation does not restrict projects that address housing burdened people.
2. Policy EJ-1a is too broad. It has implications for public infrastructure such as roads, sewer and water, solid waste, and other facilities that would not in fact be harmful to vulnerable folks. This is especially true given the extensive rural areas that are being recommended for EJ designation. Think about existing facilities located in the EJ areas and whether or not they are really affecting vulnerable communities. This policy should be revised to clarify that the land use strategies to the extent feasible avoid locating new facilities in areas affecting vulnerable communities. Have the affected public agencies been advised of this policy?
3. Policy EJ-2b needs clarification. What is "agricultural pollution spray"?...and why is the policy apparently applied more broadly than in EJ areas>
4. The use of census tracts to designate the EJ communities means that large areas of the County are being designated that likely would not qualify if a more refined analysis were conducted. I realize that the boundaries could be adjusted as part of the GP Update, but that could take years. It would make more sense to just designate the state mandated and tribal areas at this time and then conduct a more thorough review during the GP update.

Thank you for your consideration

greg carr

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.