



filed via e-mail

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Sonoma County Planning Commission  
Chair McCaffery  
Commissioner Freeman  
Commissioner Gilardi  
Commissioner Striplen  
Commissioner Koenigshofer  
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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 VOTMA identifies deficiencies in the dSEU and questions whether the use of the proposed dA to a now badly outdated 2008 Certified EIR is an appropriate or lawful vehicle for compliance with the County's CEQA obligations in this General Plan Element Update.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  
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