



filed via e-mail

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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