



## DETAILED DISCUSSION

### Fully Uphold Protective Land Use Policies in General Plan and Development Code

Over the past three years, mostly since the 2017 wildfire crisis and during the pandemic, there has been an increase in projects proposed and forwarded by Permit Sonoma that are inconsistent with longstanding county land use policies and codes. In more and more cases, public hearings are being waived and public notice is very short. The General Plan is effectively being amended regularly while the General Plan update is on hold, resulting in major changes in land use moving forward while the public is facing multiple crises.



The Board of Supervisors should fully uphold existing Land Use Policies in General Plan and Development Code and halt any further General Plan Amendments or Development Code changes or variances until the General Plan is updated along with the Development Code.

Right now, the environmental community is spending significant time and scarce resources educating elected appointed officials about policies and projects that don't comply with the existing General Plan and Development Code and must be denied. In some cases, lawsuits are triggered when inconsistent land use changes are wrongly approved. We would much prefer to partner with the county to develop new environmentally just and climate resiliency policies for the next generation and beyond.

Examples include: the luxury resort in the community separator, new gas stations in rural areas, new event centers, lodging and non-ag uses on agricultural and coastal lands, scattered housing rezone, and permitting new development in rural fire-prone areas without required and adequate road width.

**Moratorium on GP Amendments and Zoning:** Instead of making more amendments and allowing variances on a case-by-case basis, the Board of Supervisors should impose a moratorium on General Plan Amendments and Zoning Variances or Revisions, commit to commencing the long overdue General Plan Update and ensure that it is completed and implemented through a robust public process.

Ensure that the proposed Zoning Code “clean up” getting underway at Permit Sonoma does not make Zoning Code changes not reflected in the General Plan. In addition, the Zoning Code “clean up” must include a full public review process.

### **Fully Uphold Open Space, Community Separator and Urban Growth Boundaries**

The Board of Supervisors needs to prioritize the will of the voters in Sonoma County and fully support, recommit to and defend voter-approved Open Spaces, Community Separators and Urban Growth Boundaries. The Board of Supervisors needs to send consistent messages of support for these provisions.

The county needs to stop permitting residential and commercial development outside of Urban Service Areas particularly in rural unincorporated areas in order to uphold city-centered growth that is the most climate resilient.

### **Climate Action and Environmentally Just Resilience**

The Board of Supervisors needs to adopt and implement specific and actionable climate measures to reduce and prevent greenhouse gas emissions and enhance climate resiliency. There is no need for more plans or resolutions. Plan for at least one new significant measure per year for the next 10 years, based on recommendations from community climate experts, social justice advocates and the RCPA. A comprehensive ballot measure should be considered for the November 2022 ballot.

The county must phase in all-electric new construction and phase out natural gas, plan for resilient microgrids, reduce new fossil fuel infrastructure such as new gasoline stations and instead replace with electric vehicle charging infrastructure.

### **Reduce Wildfire Risk**

The Board of Supervisors needs to adopt and implement specific and actionable wildfire risk reduction measures for all new development in the wildland urban interface. **Specifically, the Board of Supervisors should adopt a wildfire risk overlay zone with stringent requirements for construction, siting, evacuation plans and firesafe roads for any new development.** The county’s fire ordinance must be updated to at least the requirements of the state SRA regulations but going beyond those is warranted given three years of wildfire disasters, evacuations and loss of life and home. The Board should plan for retreat from high fire zones and disincentivizing new development in the WUI.

### **Fully Uphold Voter Approved Ag + Open Space District and adopt Vital Lands**

The Ag + Open Space District needs to be maintained as such and not compromised for any specific interest group such as agriculture or parks.

The process of accepting Bill Keene’s retirement and hiring a new General Manager for the Ag + Open Space District was done entirely behind closed doors, upsetting not only the environmental community, but also the ag community. This first of hopefully many meetings with environmental stakeholders is a good first step in finding a successor to Bill Keene, however, the

Non-Disclosure Agreements the community comprised committee were required to sign prevent them from sharing any information with their constituents.

The Vital Lands Initiative was developed over an extensive multi-year public stakeholder process supported with extensive science, mapping and expert analysis by ag + Open Space District staff. When it went to the Board for final review and approval, it was blocked by the Farm Bureau's last-minute opposition to the proposed funding allocations. This was after about a year of behind closed-door meetings with the agricultural community to address their concerns.

The supervisors need to uphold the existing extensive public outreach process, staff expertise and balanced funding allocation and immediately adopt Vital Lands to provide a clear path forward for the Ag + Open Space District and the voters of Sonoma County.

In addition, Vital Lands must ensure equitable open space conservation in all Districts of the county. For example, in the Petaluma region, especially the Petaluma River, more investment is needed in wetlands, marsh and significant tributaries. The funding priority language of the last SCAPOSD legislation specifically calls out significant habitats and resources that aren't mentioned in the Vital Lands mapping and descriptions.

### **Prioritize Transparency and Public Outreach**

The Brown Act does not REQUIRE secrecy. In fact, it merely allows secrecy for a limited number of issues. But beyond those specific issues as defined in the Brown Act, please limit closed sessions as much as possible, and discuss matters in open session, in full view of the voters and the public.

### **Sonoma Developmental Center**

One example where more public transparency is needed is with the Sonoma Development Center Specific Plan process. Other than occasional Zoom meetings with the consultants, there has not been enough public outreach or details about what is happening on these lands. The water is off, and it is unclear if or how the lands are being managed. The high value conservation lands and potential lands for development are of critical interest to Sonoma Valley residents as well as the county at large and the people of California who own the property managed by state agencies.

### **Commit Fully to the California Environmental Quality Act**

The provisions and intention of CEQA must be fully followed and implemented by Sonoma County. This is the cornerstone policy for protecting both the environment and Sonoma County residents from the negative impacts of development. It is not only about protecting birds and trees, but about ensuring clean air, water and environment for all neighborhoods across the income spectrum, and that there will be adequate sewer/water/police and fire services/parks for all residents of Sonoma County.

Except in clearly defined cases as spelled out in CEQA itself (such as for city-centered infill development or affordable housing), shortcutting the process thorough use of Categorical Exemptions, Mitigated Negative Declarations and Statements of Overriding Considerations does a disservice to the residents of Sonoma County. It also puts the county at risk of lengthy and expensive lawsuits.

While there is a perception that CEQA impedes development, the statistics show that not to be the case.

**County Staff vs Consultants:** The County has been utilizing an extremely questionable process of hiring a CEQA consultant – MIG, generally – to prepare a CEQA document, and then hiring the very same person who prepared the CEQA document (or at least another MIG employee) to be the contract planner for the project the CEQA document was prepared for. You can easily see the obvious conflict of interest that this process ensures.

One recent example of this questionable process was on the Solstice Sonoma/Buzzard's Gulch project proposed in a Community Separator. Fortunately, the Planning Commission realized that the project was inappropriate and unacceptable under the law for the project site, denied the project, and the project applicant chose not to appeal, because the MIG prepared CEQA document and MIG contract project planner made multiple claims and assertions for which there was no basis in law.

Your commitment to CEQA would show that you believe in making Sonoma County the best it can be for everyone, and that you care about both the law and an open and transparent public process.

## **NEXT STEPS**

As next steps, we urge you to share with us your environmental and other policy priorities in the coming year and beyond and how it aligns with ours. We'd like to meet with you on a regular basis so that we can partner on developing strong new environmental, climate action, social equity and other policies to create a more healthy, equitable and diverse Sonoma County.

Thank you for your consideration of our views.

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