RE: SONOMA COUNTY GENERAL PLAN UPDATE - PUBLIC PROCESS AND ENVIRONMENTAL PRIORITIES

The environmental and allied organizations listed here are calling on the County of Sonoma to prioritize the update of the General Plan through a robust, diverse and inclusive public process that prioritizes climate actions and a just transition to a green and resilient future. Sustainability is built on three pillars: environment, economy, and equity.

Please consider these immediate priorities and actions:

1. Initiate public scoping on the extent and priorities of the General Plan Update (GPU) as soon as possible and to complete it within the first six months of 2020, per the Permit Sonoma Comprehensive Work Plan timeline.
2. Conduct a comprehensive GPU that provides clarity, specificity and measurable benchmarks and outcomes for long-term land use planning.
3. Conduct a robust public process for the GPU as described in Section 1 below.
4. Provide baseline information on current General Plan as described in Section 2 below.
5. Develop and prioritize climate measures to reduce and prevent greenhouse gas emission throughout the GPU. See Section 3 below.
6. Prioritize GPU elements with policies and programs as described in Section 3 below.
OVERVIEW

Since the last Sonoma County General Plan, there has been a sea change in our understanding of the need for climate protection and equity, alongside widespread awareness of rapidly increasing economic inequality. This new understanding and awareness also includes recognition of the growing threat of natural resource scarcity and depletion, influenced by the climate crisis and driven by natural limits alongside a growing population.

The Sonoma County General Plan needs to be equitable, inclusive, and community-driven. In order for Sonoma County to adapt and thrive in the face of the climate crisis, the Sonoma County General Plan needs to set goals, objectives and actions that are not just incremental, but ambitious and transformative.

In our vision, the Sonoma County General Plan is a roadmap for sustainability and resiliency now and in the future, recognizing that our own experience of the climate crisis enables us to understand the magnitude of what is now our greatest threat to the survival of people and the planet.

Statement of Principles and Goals

The Sonoma County General Plan shall provide the legal and policy framework for healthy, diverse and equitable climate-resilient communities while preserving and enhancing natural and working rural lands for the next generation and beyond. The County needs to retain the current General Plan’s goals of city-centered growth, protecting agriculture and preserving rural character. Sonoma County voters have approved multiple initiatives to preserve open space, fund parks and recreational facilities, protect greenbelts and uphold urban growth boundaries.

The General Plan must define the path forward to prepare the people who live, work and play here for the emerging and continuing challenges that we are facing in the decades to come.

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PLEASE SEE SECTIONS 1, 2 AND 3 FOR DETAILED COMMENTS BELOW.
SECTION 1 - ROBUST PUBLIC PROCESS

The Sonoma County General Plan Update must be developed through a robust public process as follows:

1. Supervisors and Permit Sonoma shall schedule public meetings, workshops and formal hearings in every supervisor’s district at times and in locations that allow working people to attend.

2. Public hearings, workshops and meetings shall be held in community venues as well as in front of official entities such as Planning Commissions (county and city), Community Advisory Councils Municipal Advisory Councils, and the Board of Supervisors.

3. People and communities across the county shall be fairly represented in the General Plan Update including those who live in the city and the rural areas with diverse cultures, languages, income and education levels, age and ethnicity, and interests.

4. All materials and comments shall be available in English and Spanish and other languages as needed.

5. All public comments must be compiled, distributed to commenters and posted publicly in English and Spanish and other languages as needed.

6. Permit Sonoma shall explain on an ongoing basis how the public comments received are prioritized and incorporated (or not) into the General Plan Update.

7. Online and phone surveys, on-line questionnaires, phone apps and other new technology shall be used to supplement public meetings and hearings, but will not supplant them.

8. Notices for General Plan Update meetings, workshops and hearings shall be scheduled well in advance and published, ideally for a whole year, so that public can plan to participate.

9. Establish a Community Advisory Committee, Technical Advisory Committee and Area of Interest Working Groups that are noticed and open to the public. The members shall represent a broad cross-section of the community including environmental, indigenous, labor, natural resource, family, and public health and safety experts in addition to agricultural, hospitality, business and development sectors.
As the General Plan update gets underway, Permit Sonoma shall provide baseline information at public workshops and online as follows:

1. Review of 2020 General Plan policies and programs that were completed, not completed, and status.
2. Review of 2020 General Plan policies and programs that worked well.
3. Review of 2020 General Plan policies and programs that did not work well and why they failed.
4. Review and Report on General Plan monitoring, enforcement and mitigation successes and shortfalls.*
5. Review of changes to General Plan guidelines by State of California.
6. Review of requirements of the California Environmental Quality Act, changes to CEQA, and compliance, including review of types of mitigations allowed.
7. Review of past and projected population and household growth based on official sources such as the State of California and Metropolitan Transportation Commission and U.S. census (the county shall not rely solely on private consultants).
8. Review of other General Plans that could serve as a model for the General Plan update.
9. Create a glossary of terms for the public use.
10. Create a General Plan toolkit and associated how-to videos with basic information for the public.

*(For example, Report the number and total acreage of exemptions or waivers provided by Permit Sonoma under the Riparian Corridor policy. This policy was a major element mitigating GP2020's environmental impact, as part of CEQA compliance.)
SECTION 3 - PRIORITY ELEMENTS AND ISSUES

CLIMATE

All General Plan elements shall be developed with the climate emergency at the forefront to ensure that we prepare for, adapt to, and prevent climate change.

- Adopt the Sonoma County Climate Action Plan policies and measures into the General Plan. Update the policies and measures to meet updated county, regional and state greenhouse gas emissions reductions goals.
- Incorporate the Regional Climate Protection Authority Strategic Plan into the General Plan.
- General Plan policies and programs shall aim to prevent and reduce Vehicle Miles Traveled and the generation of Greenhouse Gas Emissions.
- General Plan policies and programs shall require that new residential and commercial development be sited to prevent and reduce increases in Vehicle Miles Traveled and Greenhouse Gas emissions.
- General Plan policies and programs shall reduce use of fossil fuels and associated products including all forms of plastic.
- Adopt and implement Zero Waste policies and programs into the General Plan.
- The County shall institute, and/or collate data collected by local institutions, as an ongoing study of the impacts of climate change on the health of our land, water and air.

ENVIRONMENTAL JUSTICE

Develop an Environmental Justice element in partnership with communities and organizations that are most burdened by climate change and environmental conditions such as air and water pollution, exposure to extreme heat and smoke inhalation affecting outdoor workers, multiple health problems affecting people living in older or substandard homes, shortage of parks, and lack of easy access to public transit, health care, public services and affordable housing.

Consult with the Just Transition Framework as recommended by North Bay Organizing Project and developed by Movement Generation to incorporate relevant policies and programs into the General Plan. See https://movementgeneration.org/justtransition/

ENERGY

- Develop a new Energy Element to prevent the proliferation of fossil fuel gas stations and to encourage all-electric infrastructure in transportation, power generation, and heating and cooling of buildings.
- Develop and encourage renewable energy production, including EV charging stations, to reduce reliance on fossil fuels. Mandate county and local governments to utilize renewable energy sources only for running infrastructure and transportation.
- Develop and implement policies to reduce investment and use of fossil fuels, such as prohibiting new gas stations.
- Develop and implement program and policies to prevent and mitigate from the proliferation of diesel generators due to power outages related to wildfire response.

DISASTERS AND PUBLIC SAFETY

- Develop new and stronger policies and programs on disaster response to wildfires, floods, and earthquakes.
- Incorporate and implement the Action Items contained in the county’s Living in a Fire Adapted Landscape report.
- Require wildfire response and evacuation plans that are more stringent than those required by the state in advance of approval of all new development in wildfire, earthquake and flood zones.
- Develop new land use policies and programs to prevent and reduce development in the Wildland Urban Interface and to harden existing homes to survive wildfires.
- Incorporate fire science into the General Plan such as from Alexandra Syphard and her colleagues that proves that city-centered growth is more wildfire safe than sprawl into the WUI; and that conserving high-risk wildfire zones as open space generates multiple climate resiliency benefits.
- Adopt policies to prevent dangerous materials to be stored or transported near communities and businesses, such as the LNG tankers in Schellville.

**LAND USE**

Sonoma County must double down on city-centered growth and shall partner with the cities to provide housing and transportation close to jobs, services and schools and to stop new residential or commercial development outside of the existing urban footprint.

- The County of Sonoma shall prepare a ballot measure as part of the General Plan Update to create urban limit lines around every existing unincorporated community to prevent expansion without a countywide vote of the people.
- Specific Plans shall be created for every unincorporated community inside the Urban Limit Lines. Every area designated as a Priority Development Area must be mapped in the General Plan and shall be tied to a Specific Plan.
- New land use policies need to be developed and implemented to reduce wildfire risk and prevent intensified development in high wildfire risk areas.
- Clarify land use policies and associated zoning code to prevent incidental and incremental change of use over time that undermines the original intent of policy.

**WATER**

- Integrate Groundwater Sustainability Plans into the General Plan and add implementing policies to meet the goals of Sustainable Groundwater Management Act.
- Included entire watersheds in groundwater sustainability and development.
- Bolster water conservation plans and policies to ensure long-term certainty through droughts.
- Strengthen protections for our rivers, streams, wetlands and watersheds to ensure water quality for human consumption and recreation balanced equally with preservation of endangered salmonids and aquatic life.

**OPEN SPACE AND NATURAL RESOURCES**

The General Plan should take every opportunity to show the economic benefits of land protection, climate action, and compact development. Conservative economic values can be taken from the Ag + Open Space District’s Healthy Lands Healthy Economies.

- Land Conservation: Incorporate the Ag + Open Space District Vital Lands Initiative priorities for land conservation into the General Plan.
- Forests: Add new policies and programs on Forest Health and sustainable forest practices to foster regeneration and wildfire prevention.
- Community Separators: Designate Community Separators in the West County around rural communities.
- Designate community separators in other areas including south of the City of Sonoma and around Penngrove as identified in Program 6 of the Open Space Element.
- Designate the 140 acres recently removed from the Rohnert Park Urban Growth Boundary as a community separator.
Scenic Landscape Units: The proposed Scenic Landscape Units for North County needs to be adopted and additional areas designated.

Habitat: Develop and adopt more expansive and detailed wildlife corridor protections.

TRANSPORTATION

Develop and enhance transportation policies and programs that will provide more public transportation, bicycle and pedestrian networks and significantly reduce single-occupancy auto travel and Vehicle Miles Traveled.

- Adopt the Vision Zero principles and programs for safer biking and walking.
- Improve and complete walking, hiking and biking networks across the county.
- Prioritize funding for a public transit network to parks and open space such as shuttles serving the Sonoma Coast and hiking, biking and walking trailheads around the county.
- Align the General Plan with county’s Comprehensive Transportation Plan and the county transportation sales tax measure project implementation (Measure M renewal).
- Reference SMART plans and policies in the General Plan.

PARKS AND RECREATION

The General Plan shall strengthen and consolidate policies for protecting and maintaining existing city, county, state and other parks and clarify policies for creating new parks.

It shall address the need for parks of various types to meet the needs of communities across the county including passive and active parks, urban parks and community gardens, green buffers, bike trails, pedestrian paths and public transit to access parks and recreation.

Incorporate the Sonoma County Integrated Parks Plan (SCIPP) into the General Plan.

AGRICULTURE AND FOOD SYSTEM

- Incorporate the implementation steps from the Sonoma County Food Action Plan into the General Plan to increase local food production and security.
- Maintain and strengthen policies and programs to prevent conversion of natural and agricultural lands to development.
- Strengthen policies and programs to facilitate product diversity and sustainability in everything we grow in Sonoma County.
- Develop and implement policies that serve crop diversity and small-scale farmers
- Develop and implement policies that increase local food production and security.
- Significantly reduce food waste and prioritize green composting facility in the county.
- Ensure that agricultural policies do not by-pass important environmental regulations or increase impacts on adjacent properties.
- Develop and implement agricultural mitigation policies for when any type of agricultural lands are converted to any use other than growing or processing agricultural products to offset the loss of farm lands.
- Increase and enforce riparian set-backs.
- Implement Winery Event Center regulations for entire county.
- Develop and adopt incentives that encourage farmers and ranchers to sequester carbon while improving soil health through programs such as carbon farming, healthy soils and local cap and trade.
- The AG + Open Space District has mapped current and potential carbon sequestration through the Greenprint tool that can be utilized to implement policies and programs to increase carbon sequestration on farms as well as forests and other vegetation types.
TOURISM

- Adopt policies to directly address the impacts of tourism on land use, the environment and the economy.
- Strengthen policies to prevent vacation rentals and second homes from significantly reducing long-term housing needs.
- Create policies to offset conversion of residential homes to vacation rentals.

FURTHER COMMENTS

The organizations signed on to this letter will have additional comments both as a group and individually as the General Plan update continues. This letter does not represent the full depth of our recommendations for the General Plan update, and we will collectively and individually have additional comments as this process gets underway.