Exhibit 3a General Plan and Area Plan Consistency Analysis

General Plan Goals, Objectives, and Policies	Consistency Analysis
Land Use Element	
	Inconsistent. Santa Rosa sites are located within the South Santa Rosa Area Plan, and Penngrove sites are located within the Penngrove Area Plan A None of the Rezoning Sites are located in the Local Coastal Plan area. Therefore, the Local Coastal Plan would not apply. An amendment to this policy is needed to ensure that a Specific or Area Plan may not include policies that are in conflict with the General Plan. In any case where an Area or Specific Plan policy would conflict with development of a site identified in the 2023-2031 Housing Element Site Inventory at its listed use and density, the Area Plan policy shall not apply. The inconsistency will be addressed by future General Plan amendments programmed in the Housing Element.
constraints of environmental suitability, protection of agriculture and other resource protection, and availability of public services. <u>Policy LU-1a:</u> This plan has relied extensively upon policies and designations set forth in previous Specific Plans and Area Plans. The County shall continue to use the following selected Specific Plans and Area Plans to implement this plan. A Specific or Area Plan may establish more detailed policies affecting proposed development but may not include policies that are in conflict with the General Plan. In any case where there appears to be a conflict between the General Plan and any Specific or Area Plan, the more restrictive policy or standard shall apply.	Per Policy LU-1h, the project EIR evaluates potential environmental constraints and suitability throughout, potential impacts to agricultural lands (Section 4.2, <i>Agriculture and Forestry Resources</i>), the availability of public services (Section 4.14, <i>Public Services and Recreation</i> , and Section 4.18, <i>Utilities and Service Systems</i>), and potential impacts from population growth (Section 4.14, <i>Population and Housing</i>). The need for higher-density housing is identified in Section 2, <i>Project Description</i> , and the project includes rezoning to allow higher-density housing. This section, in particular this table and impact analysis, provides a consistency determination with applicable goals, objectives, and policies. The project is not consistent with the population growth projections
 (1) Airport/Industrial Specific Plan (2) South Santa Rosa Area Plan (3) Bennett Valley Area Plan (4) Sonoma Mountain Area Plan (5) West Petaluma Area Plan 	throughout General Plan 2020, including those referenced in Goal LU-1 and Policy LU-1i. The General Plan was adopted in 2008, and does not provide population, housing, or employment projections beyond 2020, which is now in the past. The Housing Element Update project is intended to meet the County's legal obligations under State law to identify adequate sites to accommodate its RHNA, which as discussed in the Draft and Final EIR, will

 (6) Petaluma Dairy Belt Area Plan (7) Penngrove Area Plan (8) Franz Valley Area Plan The Sonoma County Local Coastal Plan is the policy document that guides land use and development in the Coastal Zone. The Local Coastal Plan is intended to be a standalone policy document that integrates the appropriate General Plan goals, objectives, and policies with those necessary to comply with the California Coastal Act. <u>Policy LU-1h:</u> Evaluate Land Use Plan amendments subject to: (1) constraints of environmental suitability, (2) protection of agriculture, (3) availability of public services, (4) the County projected population and employment levels, (5) the need for workforce housing, and (6) other plan goals, objectives, and policies. <u>Policy LU-1i:</u> In the event that the monitoring programs show inadequate public services for planned growth or that planned growth significantly exceeds the County total unincorporated area projections in Tables LU-2, LU-5, or LU-6 and identified in the GP 2020 Final EIR, consider moratoria on development entitlements, permit allocations or other growth management measures 	result in exceedance of the General Plan 2020 projections. The project would be consistent with and help to meet this identified housing need and the newly adopted RHNA allocation. The inconsistency created by adoption of the Housing Element Update project with Goal LU-1, Policy LU-1i, and other General Plan objectives and policies tied to 2020 population projects will be addressed in programmed future amendments to the General Plan.
Goal LU-2: Accommodate the major share of future growth within the nine existing cities and their expansion areas and within selected unincorporated communities, which are planned to have adequate water and sewer capacities. Objective LU-2.2: Allocate the largest portion of unincorporated area growth to communities with public sewer and water services.	Consistent. The project sites are all within designated Urban Service Areas, where the infrastructure for public services and utilities is already available for sites to connect. The project EIR Section 4.14, <i>Population and Housing</i> , of this EIR describes the consistency of the project with growth projections for the Unincorporated County. None of the Rezoning Sites are located in rural areas, as they are all near established communities and incorporated cities. The project, by definition, would encourage the development of higher

Objective LU-2.3: Limit the amount of population growth and development in rural portions of the County outside of the cities and the unincorporated communities.Objective LU-2.5: Provide sufficient opportunities for higher density housing within the Urban Service Areas to accommodate the population growth quantified in the Housing Element Objectives for lower and moderate income units.Policy LU-2a: Maintain a residential holding capacity that is as close as possible to projected growth. Consider denial of Land Use Map amendments that add residential density in rural areas if residential holding capacity exceeds projected growth, recognizing that future development may not always use 100% of the capacity of all parcels.Policy LU-2c: Encourage the retention and production of diverse types of housing within Urban Service Areas in order to provide adequate housing choices for current and future residents.Policy LU-2d: Inventory, conserve and increase the amount and type of housing that accommodates those with special housing needs. Populations needing special types of housing include farm employees, the terminally ill, mentally disabled, handicapped people, abused spouses and children, and the homeless.	density housing within designated Urban Service Areas per Objective LU- 2.5, and would provide an increased variety of housing types in Urban Service Areas, including higher-density housing, per Policies LU-2c and LU- 2d.
 Goal LU-3: Locate future growth within the cities and unincorporated Urban Service Areas in a compact manner using vacant "infill" parcels and lands next to existing development at the edge of these areas. Objective LU-3.2: Provide enough land for the expansion of cities and unincorporated Urban Service Areas to accommodate, but not substantially exceed, the projected urban growth. Land planned for urban development in each planning area is shown on the Land Use Maps. Objective LU-3.3: Encourage "infill" development within the expansion areas of the cities and unincorporated communities. 	Inconsistent. The project, by definition, would encourage future growth in designated Urban Service Areas on vacant or underdeveloped parcels. The project EIR Section 4.14, <i>Population and Housing</i> , of this EIR describes the consistency of the project with growth projections for the Unincorporated County. All Rezoning Sites are within designated Urban Service Areas, where sewer and water service infrastructure is already available in the vicinity of the sites, although not always located directly adjacent to each Rezoning Site (refer to Section 4.18, <i>Utilities and Service Systems</i>). However, the project exceeds the General Plan growth projections and is therefore not consistent with Objective LU-3.2 and related policies. These inconsistencies will be addressed by future General Plan amendments programmed in the Housing Element.

Policy LU-3c: Avoid urban sprawl by limiting extension of sewer or water services outside of designated Urban Service Areas	Policy LU-3b: In designated Urban Service Areas, maintain a residential holding capacity that is as close as possible to projected growth. Consider denial of Land Use Map amendments that add residential density if residential holding capacity exceeds projected growth, recognizing that future development may not
uant to the policies of the Public Facilities and Services	r services outside of designated Urban Service Areas
ent.	uant to the policies of the Public Facilities and Services

	on 4.16, <i>Transportation</i> , regarding the adequacy of site access astructure in the vicinity of the Rezoning Sites.
around the county's cities and communities. Maintain them in a largely open or natural character with low intensities of development.character, Con Separators are resource land and protect na and limit development.Objective LU-5.1: Retain low intensities of use in Community Separators between and around cities and communities as designated in the Open Space and Resource Conservation Element.and protect na and limit development.Policy LU-5a: The County shall neither approve extension of sewer service into any Community Separator nor approveScenic Landsc provide addition	he project EIR Section 4.1, <i>Aesthetics</i> , addresses scenic mmunity Separators, and Scenic Landscape Units. Community e rural open spaces, agricultural lands, and other natural s that separate cities and other communities, prevent sprawl atural resources. They were established with voter approval elopment within their boundaries through General Plan oning Code development standards. All proposed project sites utside of Community Separators. Tape Units are zoning designations that protect ridgelines, and ional screening of new structures from public view. The ject sites are also located outside of Scenic Landscape Unit

well as the open space, separation, and visual considerations identified in this section. The integrity of Community Separators cannot be maintained at densities in excess of one unit per ten acres. However, under no circumstances shall this policy be used to justify an increase in density from that designated on the Land Use Map.

Goal OSRC-1: Preserve the visual identities of communities by maintaining open space areas between cities and communities. Objective OSRC-1.2: Retain a rural character and promote low intensities of development in Community Separators. Avoid their inclusion in City Urban Growth Boundaries or Spheres of Influence. Avoid their inclusion within Urbans Service Areas for unincorporated communities.

<u>Policy OSRC-1a:</u> Avoid amendments to increase residential density in Community Separators, since these densities were established based upon the policies set forth in other elements of this plan as well as the open space, separation and visual considerations identified in this section. The integrity of Community Separators cannot be maintained at densities in excess of one unit per ten acres. However, under no circumstances shall this policy be used to justify an increase in density from that designated on the land use map.

Goal OSRC-2: Retain the largely open, scenic character of important Scenic Landscape Units.

Objective OSRC-2.1: Retain a rural, scenic character in Scenic Landscape Units with very low intensities of development. Avoid their inclusion within spheres of influence for public service providers.

<u>Policy OSRC-2a</u>: Avoid amendments to increase residential density in Scenic Landscape Units in excess of one unit per ten acres. The land use plan may designate a lower density or larger minimum lot size.

 Goal LU-6: Diversify new residential development types and densities. Include a range of urban densities and housing types in some unincorporated communities, and lower density in rural communities. In rural areas, housing types and densities should meet the needs of agricultural and resource users and provide limited residential development on large parcels. Objective LU-6.1: Provide opportunities for a range of urban housing types and densities in unincorporated communities, while retaining the character of these communities. Objective LU-6.2: Limit residential density to a maximum of one dwelling per acre in unincorporated communities with public water but without sewer systems. Objective LU-6.6: Encourage the development of adequate housing for farm workers and farm family members. Site specific environmental factors shall be considered in making decisions on development permits. Site specific factors which create health or safety problems or result in unmitigated significant environmental impacts may at times reduce densities that are allowed by the Land Use Map and zoning. Policy LU-6i: Provide expanded opportunities for a mix of residential and commercial or industrial use in Urban Service Areas. 	Consistent. The project would encourage higher-density housing in Urban Service Areas that currently contain or are located near single-family housing. This would introduce new residential development types and densities, per Goal LU-6, and the project would utilize the AH (Affordable Housing) Combining District to increase affordable housing in Urban Service Areas, per Objective LU-6.6 and Policy LU-6h. As stated in the project EIR Section 4.18, <i>Utilities and Service Systems</i> , the Rezoning Sites are within areas where public water and public sewer connections are available in the general vicinity although not always located directly adjacent to each Rezoning Site. Refer to Section 4.7, <i>Geology and Soils</i> ; Section 4.9, <i>Hazards and Hazardous</i> <i>Materials</i> ; and Section 4.19, <i>Wildfire</i> , for a discussion of site-specific environmental factors that could create health and safety problems. As described under Impact LU-1, adjacent land to the Rezoning Sites are currently used or zoned for residential purposes.
 Goal LU-7: Prevent unnecessary exposure of people and property to environmental risks and hazards. Limit development on lands that are especially vulnerable or sensitive to environmental damage. Objective LU-7.1: Restrict development in areas that are constrained by the natural limitations of the land, including but not limited to, flood, fire, geologic hazards, groundwater availability and septic suitability. Policy LU-7a: Avoid General Plan amendments that would allow additional development in flood plains, unless such development 	Consistent. Refer to the project EIR Section 4.7, <i>Geology and Soils</i> ; Section 4.9, <i>Hazards and Hazardous Materials</i> ; and Section 4.19, <i>Wildfire</i> , for a discussion of site-specific environmental factors that could create health and safety problems. Refer to Section 4.18, <i>Utilities and Service Systems</i> , for a discussion of sewer service to the Rezoning Sites. Refer to Section 4.10, <i>Hydrology and Water Quality</i> , regarding development in floodplains; as stated therein, Rezoning Sites GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, and PEN-9 are partially within a 100-year floodplain. Future development on these sites would be required to comply with Policy LU-7c,

is of low intensity and does not include large permanent structures. <u>Policy LU-7b:</u> Limit development in wetlands designated on Figure OSRC-3 of the Open Space and Resource Conservation Element. <u>Policy LU-7c:</u> Prohibit new permanent structures within any floodway. Require that any development that may be permitted within the flood plain to be raised above the 100 year flood elevation. <u>Policy LU-7d:</u> Avoid new commercial, industrial, and residential land use designations in areas subject to "high" or "very high" fire hazards, as identified in the Public Safety Element, unless the combination of fuel load, access, water supply, and other project design measures will reduce the potential fire related impacts of new development to insignificant levels.	with site design placing permanent new structures outside of the floodway and raised above the 100-year flood elevation. Refer to Section 4.4, <i>Biological Resources</i> , regarding the presence of wetlands on the Rezoning Sites. Mitigation Measures BIO-15 and BIO-16 require jurisdictional delineations prior to development on Rezoning Sites and avoidance of wetland features or minimization of impacts to wetlands. Refer to Section 4.19, <i>Wildfire</i> , regarding the wildfire risk designation of each Rezoning Site. As stated therein, some of the sites are within Moderate Fire Hazard Severity Zones, and compliance with mitigation would be required to reduce impacts.
 Goal LU-9: Protect lands currently in agricultural production and lands with soils and other characteristics that make them potentially suitable for agricultural use. Retain large parcel sizes and avoid incompatible non-agricultural uses. Objective LU-9.1: Avoid conversion of lands currently used for agricultural production to non-agricultural use. Objective LU-9.2: Retain large parcels in agricultural production areas and avoid new parcels less than 20 acres in the "Land Intensive Agriculture" category. Objective LU-9.3: Agricultural lands not currently used for farming but which have soils or other characteristics that make them suitable for farming shall not be developed in a way that would preclude future agricultural use. Objective LU-9.4: Discourage uses in agricultural areas that are not compatible with long term agricultural production. Policy LU-9c: Use rezonings, easements and other methods to ensure that development on agricultural lands does not exceed 	Consistent. The project EIR Section 4.2, <i>Agriculture and Forestry Resources</i> , addresses the existence of agricultural soils on each Rezoning Site. As stated therein, none of the Rezoning Sites contain prime farmland, unique farmland, farmland of statewide importance, forest land, or timberland. However, some of the Rezoning Sites are currently zoned for low density residential agriculture or adjacent to existing agricultural uses, and Mitigation Measure AG-1 would require an agricultural protection buffer for future development on Sites GEY 1, GEY-4, GUE-2, GUE-3, LAR-7, FOR-3, FOR-5, SAN-10, SON-1, SON-2, SON-3, and SON-4.

the permitted density except where allowed by the policies of the Agricultural Resources Element.	
Goal LU-11: Promote a sustainable future where residents can enjoy a high quality of life for the long term, including a clean and beautiful environment and a balance of employment, housing, infrastructure, and services.Policy LU-11b: Encourage all types of development and land uses to use alternative renewable energy sources and meaningful energy conservation measures.Policy LU-11e: Encourage use of compact and mixed use development that minimizes the need to drive, re-uses existing infill and brownfield sites that have been reclaimed and remediated before using open land, and avoids sprawl.GOAL OSRC-14: Promote energy conservation and contribute to energy demand reduction in the County. Policy OSRC-14e: Develop energy conservation and efficiency design standards for new development.	Consistent . The project EIR Section 4.6, Energy, and Section 4.8, Greenhouse Gas Emissions address energy usage by new development. Mitigation Measure GHG-1 would require all new residential construction to be all-electric, and would not have natural gas plumbing or appliances. New construction would be built to CALGreen Tier 2 off-street electric vehicle requirements. By its nature, the project encourages compact and mixed use development, and use of existing infill and brownfield sites following remediation as needed.
 Objective LU-15.2: Limit new uses within the floodway of the Russian River, as designated on the Federal Flood Insurance Rate Maps (FIRM), to recreation and visitor serving commercial uses without permanent structures. Prohibit amendments to the Land Use Map that would allow new residential subdivisions within the boundaries of the 100-year flood event. Objective LU-15.4: Maintain the "rural village" character of Forestville through design and development standards that support small scale development with substantial open space and native landscaping. Policy LU-15a: Phase residential and commercial development within the Forestville Urban Service Boundary to allow the community facilities and services adequate time to absorb new 	Inconsistent. The project EIR Section 4.10, <i>Hydrology and Water Quality</i> , addresses floodplain impacts. No development can occur in any FEMA floodway per the County Zoning Code Article 56. Project sites GUE-4 and GRA-2 arepartially within a 100-year floodplain. Future development on these sites would be required to comply with General Plan Policy LU-7c, with site design placing permanent new structures outside of the floodway and raised above the 100-year flood elevation. The rezoning of sites does not determine the timing of future development, which would be initiated by private owners and developers at the time that is most opportune for them. Although it cannot be determined with certainty the timing and pace of future development, development would not exceed the capacity of water and sewer service. Projects would be required to obtain will-serve letters from local service providers to

growth, and to maintain the community character. For any project of 10 or more housing units, require a precise development plan or master plan that specifies the maximum number of new residential units to be built per year.	demonstrate adequate service capacity, in compliance with Mitigation Measure UTIL-1. The project EIR Section 4.1, <i>Aesthetics</i> , addresses impacts to scenic resources and community character. Due to recent changes to state law, a development facilitated by the project cannot be made to comply with subjective design guidelines. Existing County Code design regulations will apply to the extent that they are objective.
Land Use Element – South Santa Rosa Area Policies Objective LU-16.1: Avoid urban development within the Urban Service Boundary of Santa Rosa until annexation except where allowed by Specific or Area Plan as of 1986. Objective LU-16.2: Limit future rural residential development to "infill" within areas already designated for such use. Policy LU-16g: Unless otherwise provided in existing Specific or Area Plans, designate lands within the Santa Rosa Urban Service Area as "Rural Residential" in order to hold them for future annexation by the City. Maintain densities in these areas at the lower end of the range for this category. Policy LU-16h: Designate the Brooks-Ward area "Limited Industrial" to recognize the eventual urban development allowed in the South Santa Rosa Area Plan. Use zoning to prevent further subdivision and urban development until the conditions established in that plan for this development have been met. Retain the land use designation "Light Industry/Planned Residential" in the plan but amend it to authorize interim uses consistent with the new zoning, such as single family dwellings on existing lots, provided water, septic and other standard conditions are met. <u>Policy LU-16p</u> : Redevelopment and/or intensification of existing uses in the Santa Rosa Urban Service Area south of Todd Road is not desirable without the extension of sewer service. Development applications prior to annexation should be limited to uses that can be served by septic systems.	Inconsistent. Project sites SAN-1, SAN-3, SAN-5, and SAN-8 are zoned Rural Residential (RR) despite having urban or industrial land uses. Three project sites are located on Brooks Avenue and are proposed to be rezoned for multifamily residential. No project would be developed without a will-serve letters from local service providers to demonstrate adequate service capacity, in compliance with Mitigation Measure UTIL-1.

Land Use Element – Sonoma Area Policies	
Objective LU-20.1: Seek to jointly coordinate and monitor development within the City of Sonoma and the unincorporated Urban Service Area. Discourage urban development within Sonoma's Urban Service Boundary until annexation by the city (excluding parcels within the Sonoma Valley Redevelopment Area).Policy LU-20a: Avoid urban residential and commercial development within Sonoma's Urban Growth Boundary until annexed by the City.Policy LU-20b: In general, encourage annexation by the city prior to urban development on parcels that are within the Sonoma Valley Sanitation District and within the city's primary Sphere of Influence. Require annexation for urban residential development an exempt from these policies.	Inconsistent. While urban development on these sites is discouraged prior to annexation into the city boundaries, the project does not propose development on these sites at this time but rezoning to allow for higher density residential development. Per the policies, future proposed development on SON-1 through SON-4 would be required to annex into the city prior to development. However, the project would facilitate urban residential development prior to annexation.
Land Use Element – Glen Ellen Area PoliciesPolicy LU-20gg: Land use for the Glen Ellen area, including residential densities, shall correspond with the General Plan Land Use Element for Sonoma Valley. New development in Glen Ellen shall be evaluated in the context of the following:(1) the relationship between growth and traffic congestion, (2) the boundaries and extent of Urban Service Areas, (3) the amount and location of recreation and visitor-serving commercial uses, (4) the need to upgrade existing structures and public infrastructure, and (5) the compatibility of rural development with protection of agriculture, scenic landscapes, and resources. Policy LU-20hh: All new development in the Glen Ellen area (as designated in the Glen Ellen Development and Design Guidelines)	Partially Consistent. The project sites are located within Urban Service Area, and mitigations in the project EIR for future residential development address impacts to public infrastructure, agriculture, and aesthetic and other resources. See Circulation and Transit Policies, below, for a discussion on level of service. New state law requires that only objective design and development standards may be applied to new ministerial development projects. These policies may need to be updated for consistency with state laws.

shall comply with the Glen Ellen Development and Design	
Guidelines, which are part of the County Development Code .	
Public Safety Element	
Goal PS-2: Reduce existing flood hazards and prevent unnecessary exposure of people and property to risks of damage or injury from flood hazards. Objective PS-2.2: Regulate new development to reduce the risks of damage and injury from known flooding hazards to acceptable levels. <u>Policy PS-2e</u> : Preserve floodplain storage capacity by avoiding fill in areas outside of the 100-year FEMA special flood hazard area that retain or could retain flood waters. <u>Policy PS-2k</u> : Use the 100-year flood event and corresponding elevations as the County measure of acceptable level of risk and protection in the consideration of any amendments of the Land Use Map. <u>Policy PS-2m</u> : Regulate development, water diversion, vegetation management, grading, and fills to minimize any increase in flooding and related damage to people and property. <u>Policy PS-2o</u> : Costs for drainage facilities to handle the surface runoff from new development shall be the responsibility of the new development. <u>Policy PS-2p</u> : Require that design and construction of drainage facilities be subject to the review and approval of the Permit and Resource Management Department. <u>Policy PS-2s</u> : Consider the potential risk of damage from flooding in the design and review of projects, including those which could facilitate floodplain development. <u>Policy PS-2t</u> : Avoid variances to building setbacks along streams and in 100-year flood plains without the review and approval of the Permit and Resource Management Department. <u>Policy PS-2t</u> : Continue to enforce County code requirements on construction in flood hazard areas and other adopted regulations which implement the National Flood Insurance Program.	Consistent. The project EIR Section 4.10, <i>Hydrology and Water Quality</i> addresses drainage and flood risk. The sites, GUE-4, GRA-2, AGU-1, AGU-2, PEN-8, and PEN-9 are partially within a 100-year flood hazard area. Development on these sites must meet floodplain development standards, achieve zero net fill on the sites, avoid fill in areas that retain flood waters, and review and approval of proposed drainage facilities by Permit Sonoma. These requirements ensure that development will not result in any net change in the 100-year floodplain.

Goal PS-3: Prevent unnecessary exposure of people and property to risks of damage or injury from wildland and structural fires. Objective PS-3.2: Regulate new development to reduce the risks of damage and injury from known fire hazards to acceptable levels. Policy PS-3b: Consider the severity of natural fire hazards, potential damage from wildland and structural fires, adequacy of fire protection and mitigation measures consistent with the Public Safety Element in the review of projects. Policy PS-3c: Continue to adopt revisions to the Uniform Fire and Building Codes and other standards which address fire safety as they are approved by inspection organizations and the State of California. Review, revise, and/or adopt existing or new local codes, ordinances, and Fire Safe Standards to reflect contemporary fire safe practices. Policy PS-3d: Refer projects and code revisions to the County Department of Fire and Emergency Services and responsible fire protection agencies for their review and comment. Policy PS-3f: Encourage strong enforcement of State requirements for fire safety by the California Department of Forestry and Fire Protection. Policy PS-31: Require automatic fire sprinkler systems or other on- site fire detection and suppression systems in all new residential and commercial structures, with exceptions for detached utility buildings, garages, and agricultural exempt buildings.	Consistent. The project EIR Section 4.19, <i>Wildfire</i> addresses risk of damage from wildfire. Development sites are located in rban service areas where fire fuels are less abundant and wildfire risk is reduced. New construction would also be subject to the California Fire Code and Building Code safety measures to minimize fire risk, such as ignition-resistant construction, and fire sprinklers. Applicable state building code requirements, including CCR Title 24, Part 2, which includes specific requirements related to exterior wildfire exposure. The Board of Forestry Fire Safe Regulations via CCR Title 14, set forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. Collectively, these codes and regulations would reduce the risk of loss, injury, or death from wildfire for new residential developments encouraged by the project, but not entirely.	
Circulation and Transit Element		
GOAL CT-1: Provide a well integrated and sustainable circulation	Consistent. The project EIR Section 4.16, Transportation, addresses existing	
and transit system that supports a city and community centered	transportation infrastructure and associated impacts. The project would	
growth philosophy through a collaborative effort of all the Cities	facilitate the development of housing on identified project sites, which are	
and the County.	located near urban areas for the purpose of concentrating future housing developments in areas close to existing commercial and office uses. The project would rezone sites to allow for increased housing densities on the	

Objective CT-1.5: Reduce greenhouse gas emissions by minimizing future increase in VMT, with an emphasis on shifting short trips by automobile to walking and bicycling trips. **Objective CT-1.6:** Require that circulation and transit system improvements be done in a manner that, to the extent practical, is consistent with community and rural character. Minimizes disturbance of the natural environment, minimizes air and noise pollution, and helps reduce greenhouse gas emissions. **Objective CT-1.8:** Improve demand for transit by development of a growth management strategy encouraging projects in urbanized areas that decrease distance between jobs and housing, increase the stock of affordable housing, and increase density. Policy CT-1k: Encourage development that reduces VMT, decreases distances between jobs and housing, reduces traffic impacts, and improves housing affordability. Policy CT-1m: Require development projects contribute a fair share for development of alternative transportation mode facilities, including pedestrian and bicycle facilities along project frontages and links from these to nearby alternative mode

facilities. Development near urban boundaries should provide safe access to the urban area.

Goal CT-3: Establish a viable transportation alternative to the automobile for residents of Sonoma County through a safe and convenient bicycle and pedestrian transportation network, well integrated with transit, that will reduce greenhouse gas emissions, increase outdoor recreational opportunities, and improve public health. Objective CT-3.3: Encourage pedestrian, bicycle, and transit oriented development.

<u>Policy CT-3v:</u> Where nexus exists, require private or public development to plan, design, and construct bicycle and

project sites, and apply the WH (Workforce Housng) Combining District or a higher-density residential zone to these sites. As described in the EIR, the project would result in a small decrease in VMT.

The project would locate residences in urban service areas in general proximity to existing and planned commercial and retail land uses, which would encourage the use of alternative modes of transportation, as well as in the vicinity of existing transit routes and bicycle/pedestrian paths. Development facilitated by the project would be required to pay impact fees and be designed to include pedestrian access continuity where appropriate and required by the County. Sites are located along or near the SMART corridors, including LAR, SAN, PEN, and PET sites, and would encourage the development of housing in areas near the SMART rail. Regarding the provision of bicycle and pedestrian improvements, the provision of crossings at bus stops, individual discretionary development of the Rezoning Sites, when proposed, would be required to comply with Policies CT-2f, CT-2v, CT-2w, and CT-3v.

Regarding circulation and transit system improvements, the individual development of the Rezoning Sites, when proposed, would be required to comply with Objective CT-1.6. At this time, no circulation or transit improvements are proposed. As discussed elsewhere, project sites are located along or near the SMART corridors, including LAR, SAN, PEN, and PET sites, and would encourage the development of housing in areas near the SMART rail. The sites are located in unincorporated Urban Service Areas, consistent with Policy CT-300.

pedestrian facilities to integrate with the existing and plannedbicycle and pedestrian network.Policy CT-300:Require new development in Urban Service Areasand unincorporated communities to provide safe, continuous andconvenient pedestrian access to jobs, shopping and other localservices and destinations. Maintain consistency with Citystandards for pedestrian facilities in Urban Service Areas that arewithin a city's Sphere of Influence or Urban Growth Boundary.GOAL CT-4: Provide and maintain a highway system capacitythat serves projected highway travel demand at acceptablelevels of service in keeping with the character of rural and urbancommunities.Objective CT-4.2: Maintain LOS D or better at roadwayintersections.Policy CT-4a: Use area and/or project traffic analyses todetermine if intersections meet the LOS standards of ObjectivesCT-4.2 and CT-4.3. Based on this analysis, identify and implementintersection improvements needed to achieve LOS D.	Generally Consistent . The development facilitated by the project will reduce vehicle miles traveled countywide. However it is possible that individual roadway intersections may experience additional congestion as a result of new vehicle trips originating from new residential uses. The Level Of Service (LOS) policies of the General Plan were adopted as mitigation measures in the General Plan EIR. As a result of new state legislation (SB 743), project impact analysis under CEQA no longer requires evaluation of LOS congestion impacts. As a result, consistency with this policy as mitigation is no longer required. Regarding fair share funding of circulation and transit system
<u>Policy CT-4f</u> : Implement safety improvements when and where problems arise. Where safety problems may result from a proposed project, require the safety improvements as a condition of approval.	improvements, as stated above development facilitated by the project would be required to pay impact fees required by the County and be designed to include pedestrian access continuity where appropriate and required by the County.
 GOAL CT-6: Integrate the funding and development of planned circulation and transit system improvements with countywide transportation planning efforts and land use planning and development approval. Objective CT-6.3: Maintain acceptable levels of service as set forth in this Element by implementing funding strategies for planned improvements. <u>Policy CT-6c:</u> Identify improvements to the Countywide transportation system that primarily serve local travel demand and are needed to accommodate new growth. Based upon an established nexus, assign responsibility for funding of these 	

improvements to new development in the affected area through	
the establishment and collection of development fees or fair	
share contributions.	
Policy CT-6f: Review and condition discretionary development	
projects in the unincorporated area to assure that the LOS and/or	
public safety objectives established in Policy CT-4a and CT-4b are	
being met. If the proposed project would result in a LOS worse	
than these objectives, consider denial of the project unless one or	
more of the following circumstances exists:	
(1) The improvements needed to meet the LOS and/or public	
safety objectives will be completed prior to occupancy of the use,	
(2) Funding is identified and committed to completion of the	
needed improvements, or	
(3) A fee or fair share contribution has been established for the	
needed improvement that will fully fund the projects fair share of	
the future improvements.	
Policy CT-6g: Require that new development provide project area	
improvements necessary to accommodate vehicle and transit	
movement in the vicinity of the project, including capacity	
improvements, traffic calming, right-of-way acquisition, access to	
the applicable roadway, safety improvements, and other	
mitigation measures necessary to accommodate the	
development.	
Public Facilities Element	
GOAL PF-1: Assure that water and wastewater services are	Consistent . The project EIR Section 4.18, Utilities and Service Systems,
available where necessary to serve planned growth and	addresses water and wastewater services. The increased demand created
development without promoting unplanned growth.	by development facilitated by the project would not exceed existing
Objective PF-1.1: Operate County water and wastewater facilities	capacity of local water and wastewater service providers. Although future
in accordance with planned growth and in compliance with	development would not require discretionary approvals, projects would be
applicable State and Federal standards.	required to obtain will-serve letters from local service providers to

Policy PF-1a: Plan, design, and construct sewer services in accordance with projected growth except as provided in Policy LU-4d.

required to obtain will-serve letters from local service providers to demonstrate adequate service capacity, in compliance with Mitigation Measure UTIL-1.

Policy PF-1d: Require as part of discretionary project applications	Although extension of water and sewer services to some of the project sites
within a water or sewer service area written certification that	would be necessary, all of the sites are located within an Urban Service
either existing services are available or needed improvements will	Area. No extensions of service would be required outside of a sphere of
be made prior to occupancy.	influence or Urban Service Area.
Policy PF-1e: Avoid General Plan amendments that would	
increase demand for water supplies or wastewater treatment	
services in those urban areas where existing services cannot	
accommodate projected growth as indicated in Table LU-1 or any	
adopted master plan.	
Policy PF-1f: Avoid extension of public sewer services outside of	
either a sphere of influence or Urban Service Area. To the extent	
allowed by law, consider exceptions to this policy only:	
(1) Where necessary to resolve a public health hazard resulting	
from existing development, or	
(2) Where appropriate to allow farmworker housing or an	
affordable housing project providing exclusively lower income	
housing on properties adjoining urban service boundaries.	
Policy PF-1h: Avoid extension of public water service to a	
property that is outside of both the Urban Service Area and	
sphere of influence of the water provider. Consider exceptions to	
this policy, to the extent allowed by law, only:	
(1) Where necessary to resolve a public health hazard resulting	
from existing development such as failing wells or groundwater	
contamination, or	
(2) Where water service is to be extended for a property which is	
located within a water district boundary in effect in November,	
2003, or	
(3) Where appropriate to allow an affordable housing project	
providing exclusively lower income housing on properties	
adjoining Urban Service Boundaries.	
Policy PF-1i: Use the following guidelines for any exception	
allowed by Policy PF-1h:	
(1) Size facilities to serve development consistent with the	
General Plan,	
	1

 countywide and five acres of local and community parks per 1,000 residents in unincorporated areas. A portion of State parklands may be included to meet the standard for regional parks. <u>Policy PF-2d</u>: Provide community parks as needed in Urban Service Areas until the area incorporates, are annexed, or another service providing entity is established. <u>Policy PF-2g</u>: Require dedication of land or in-lieu fees as a means of funding park and fire services and facilities. <u>Policy PF-2x</u>: Utilize development fees to require that new development pay for its share of needed infrastructure as identified in existing and future Capital Improvement Plans prepared by the County. Agricultural Resources Element 	would be required to pay this during the permit approval process. Therefore, the project is not anticipated to result in the need for new or physically altered parks or recreational facilities and would not result in substantial physical deterioration of existing parks.
 (2) Require written certification that adequate service capacity is available for the use to be connected to the system or planned to be connected in the future, and (3) Utilize out-of-service area agreements rather than annexations. GOAL PF-2: Assure that park and recreation, public education, fire suppression and emergency medical, and solid waste services, and public utility sites are available to the meet future needs of Sonoma County residents. Objective PF-2.1: Provide an adequate supply and equitable geographic distribution of regional and local parks and recreation services based on population projections. Objective PF-2.8: Continue to coordinate fire protection services and planning with all other related agencies. Policy PF-2c: Use the following standards for determination of park needs: Twenty acres of regional parks per 1,000 residents 	Consistent. The project EIR Section 4.15, <i>Public Services and Recreation</i> addresses impacts to parks. Development facilitated by the project would increase use of existing park facilities, and a total park-to-resident ratio of approximately 24.9 acres of regional, community, and neighborhood park space per 1,000 residents. As such, the County would fall short of its park ratio goal of 25 acres of regional, community, and neighborhood parks per 1,000 residents countywide. To address this shortage, the County requires payment of in-lieu fees to fund park facilities offsetting any impacts related to increased demand at existing recreation facilities, and project applicants of the Rezoning Sites

County-designated Urban Service Areas, geographical areas within the

Maintain the maximum amount of land in parcel sizes that a farmer would be willing to lease or buy for agricultural purposes.Objective AR-3.1: Avoid the conversion of agricultural lands to residential or nonagricultural commercial uses.Policy AR-3f: Avoid amendments of the land use map from an agricultural to a non agricultural use category for the purpose of allowing increased residential density which may conflict with agricultural production.	urban growth boundary of a city or unincorporated community designated for urban development. None of these lands are considered prime or important farmlands, as designated by the FMMP mapping program. Many of the identified parcels and their adjacent uses are currently zoned for rural residential or limited density, and in some cases existing agricultural cultivation. However these, sites are in more urbanized, primarily residential areas, and cultivation is limited to small scale and low impact activities compatible with residential uses.
GOAL AR-4: Allow farmers to manage their operations in an efficient, economic manner with minimal conflict with nonagricultural uses. Objective AR-4.1: Apply agricultural land use categories only to areas or parcels capable of the commercial production of food, fiber and plant material, or the raising and maintaining of farm animals including horses, donkeys, mules, and similar livestock. Establish agricultural production as the highest priority use in these areas or parcels. The following policies are intended to apply primarily to lands designated within agricultural land use categories. Policy AR-4c: Protect agricultural operations by establishing a buffer between an agricultural land use and residential interface. Buffers shall generally be defined as a physical separation of 100 to 200' and/or may be a topographic feature, a substantial tree stand, water course or similar feature. In some circumstances a landscaped berm may provide the buffer. The buffer shall occur on the parcel for which a permit is sought and shall favor protection of the maximum amount of farmable land.	Consistent . Several sites in Geyserville, Guerneville, Graton, Santa Rosa and Sonoma are located adjacent to existing agricultural uses. Changes to the environment that result from development could impact these operations. Mitigation Measure AG-1 would achieve consistency with these policies by requiring development adjacent to active agricultural operations to provide fencing and a minimum buffer of 200 feet to the agricultural operations. If this distance is not practical due to project design or features, a minimum 100-foot buffer is acceptable if it complies with all of the requirements for a reduced buffer and a vegetative screen is provided as specified in Section 26-88-040(f) of the Sonoma County Zoning Code.
Water Resources Element	
GOAL WR-1: Protect, restore and enhance the quality of surface and groundwater resources to meet the needs of all reasonable beneficial uses.	Consistent. The project EIR Section 4.10, <i>Hydrology and Water Quality</i> addresses impacts to groundwater. The County requires new construction to implement measures eliminating groundwater pollutants and minimizing stormwater runoff, including grading requirements. New housing would

Objective WR-1.2: Avoid pollution of stormwater, water bodies and groundwater. <u>Policy WR-1q</u> : Require new development projects to evaluate and consider naturally-occurring and human caused contaminants in groundwater.	connect to local wastewater purveyors, paying service fees for discharge into the sewer system. No groundwater contamination from wastewater discharge would occur.
GOAL WR-4: Increase the role of conservation and safe, beneficial reuse in meeting water supply needs of both urban and rural users.Objective WR-4.2: Promote and encourage the efficient use of water by all water users.Policy WR-4e: Require water conserving plumbing and water conserving landscaping in all new development projects and require water conserving plumbing in all new dwellings. Promote programs to minimize water loss and waste by public water suppliers and their customers. Require County operated water systems to minimize water loss and waste.	Consistent . The current requirements of the CALGreen Green Building codes include maximum flow rates for water efficiency in new residential construction.
Noise Element	
GOAL NE-1: Protect people from the adverse effects of exposure to excessive noise and to achieve an environment in which people and land uses may function without impairment from noise. Objective NE-1.2: Develop and implement measures to avoid exposure of people to excessive noise levels. Policy NE-1b: Avoid noise sensitive land use development in noise impacted areas unless effective measures are included to reduce noise levels. For noise due to traffic on public roadways, railroads and airports, reduce exterior noise to 60 dB Ldn or less in outdoor activity areas and interior noise levels to 45 dB Ldn or less with windows and doors closed. Where it is not possible to meet this 60 dB Ldn standard using a practical application of the best available noise reduction technology, a maximum level of up to 65 dB Ldn may be allowed but interior noise level shall be	Consistent . The project EIR, Section 4.13, <i>Noise</i> addresses noise levels in the vicinity of development sites. Numerous sites are near noise-generating land uses such as major roadways and railroad lines. Proposed mitigation includes the preparation of a noise analysis, and the use of building materials with higher sound transmission ratings if exceeding General Plan standards for indoor and outdoor noise. If a proposed project locates permanent backup generators or HVAC equipment near a noise sensitive receptor, prior to approval of building permits, a noise analysis consistent with County guidelines demonstrating that the equipment would not contribute to cumulative exceedance of noise standards at receiving noise-sensitive land uses. Through the building permit review and approval process, state noise insulation standards for multifamily residential would also be enforced.

maintained so as not to exceed 45 dB Ldn. For uses such as Single Room Occupancy, Work-Live, Mixed Use Projects, and Caretaker Units, exterior noise levels above 65 dB Ldn or the Table NE-2 standards may be considered if the interior standards of 45 dB Ldn can be met. For schools, libraries, offices, and other similar uses, the interior noise standard shall be 45 dB Leq in the worst case hour when the building is in use.

Policy NE-1c:

Control non-transportation related noise from new projects. The total noise level resulting from new sources shall not exceed the standards in Table NE-2 as measured at the exterior property line of any adjacent noise sensitive land use. Limit exceptions to the following:

(1) If the ambient noise level exceeds the standard in Table NE-2, adjust the standard to equal the ambient level, up to a maximum of 5 dBA above the standard, provided that no measurable increase (i.e. +/- 1.5 dBA) shall be allowed

(2) Reduce the applicable standards in Table NE-2 by five dBA for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises, such as pile drivers and dog barking at kennels

(3) Reduce the applicable standards in Table NE-2 by 5 decibels if the proposed use exceeds the ambient level by 10 or more decibels

(4) For short term noise sources which are permitted to operate no more than six days per year, such as concerts or race events, the allowable noise exposures shown in Table NE-2 may be increased by 5 dB. These events shall be subject to a noise management plan including provisions for maximum noise level limits, noise monitoring, complaint response and allowable hours of operation. The plan shall address potential cumulative noise impacts from all events in the area.

(5) Noise levels may be measured at the location of the outdoor activity area of the noise sensitive land use, instead of the

exterior property line of the adjacent noise sensitive land use
where:
(a) the property on which the noise sensitive use is located has
already been substantially developed pursuant to its existing
zoning, and
(b) there is available open land on those noise sensitive lands for
noise attenuation.
This exception may not be used on vacant properties which are
zoned to allow noise sensitive uses.
Policy NE-1g: Enforce the State Noise Insulation Standards (Title
24, Part 2, California Administrative Code and Appendix Chapter
12 of the California Building Code) concerning new multiple
occupancy dwellings.

Penngrove Area Plan Policies	
Policy I.A(4) : Support a development pattern which enforces a sense of community by placing higher densities in the core area and increasingly lower densities on the outlying area.	Consistent. The project sites are all within designated Urban Service Areas, where the infrastructure for public services and utilities is already available for sites to connect. None of the sites are located in rural areas, as they are all near established communities and incorporated cities. The project would encourage development at higher density nearer to Main Street per the Penngrove Area Plan and Objective LU-2.5, and would provide an increased variety of housing types in Urban Service Areas, including higher-density housing, per Policies LU-2c and LU-2d.
Policy II.A(1): Coordinate roadways and land use planning to avoid overloading the existing road system.	Inconsistent. The development facilitated by the project will reduce vehicle miles traveled countywide. However it is possible that individual roadway intersections may experience additional congestion as a result of new vehicle trips originating from new residential uses. The Level of Service (LOS) policies of the General Plan were adopted as mitigation measures in the General Plan EIR. As a result of new state legislation (SB 743), project impact analysis under CEQA no longer requires evaluation of LOS congestion impacts. As a result, consistency with this policy as mitigation is no longer required.

South Santa Rosa Area Plan Policies	
 Land Use (1): Promote compactness of the Santa Rosa City urban boundary in order to provide urban level public services efficiently. Housing (1): Establish land use designations and inclusionary zoning, which promote housing opportunities in areas where compatible with surrounding land use, and where transportation system and public services exist. 	Consistent . By its nature, the project would encourage higher-density housing in Urban Service Areas that currently have adequate levels of urban public services. The project would introduce new residential development types and densities, per Goal LU-6 of the General Plan, and would utilize the AH Combining District to increase affordable housing in Urban Service Areas, per Objective LU-6.6 and Policy LU-6h of the General Plan.
Flood Hazards (1): Restrict uses in 100-year floodplains to those that pose the least hazard to public health and safety.	Consistent . The project EIR Section 4.10, <i>Hydrology and Water Quality</i> , addresses floodplain impacts. No development can occur in any FEMA floodway per the County Zoning Code Article 56. No project sites in the South Santa Rosa Area Plan are located . Future development on these sites would be required to comply with General Plan Policy LU-7c, with site design placing permanent new structures outside of the floodway and raised above the 100-year flood elevation.
Fire Hazards (1): Discourage residential development in regions having high or very high potential for large wildland fires in the Public Safety Element of the General Plan.	Generally Consistent . The project EIR Section 4.19, Wildfire addresses risk of damage from wildfire. Development sites are located in urban service areas where fire fuels are less abundant and wildfire risk is reduced. Proposed sites within the South Santa Rosa Area Plan are located approximately 0.6 miles from the nearest Fire Hazard Severity Zone, designated moderate. New construction would also be subject to the California Fire Code and Building Code safety measures to minimize fire risk, such as ignition-resistant construction, and fire sprinklers. Applicable state building code requirements, including CCR Title 24, Part 2, which includes specific requirements related to exterior wildfire exposure. The Board of Forestry Fire Safe Regulations via CCR Title 14, set forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. Collectively, these codes and regulations would reduce the risk of loss, injury, or death from wildfire for new residential developments encouraged by the project, but not entirely.