

General Plan 2020 Audit - Public Administrative Draft October 2024

*General Plan Sonoma Community Visioning
(Phase 1)*



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INTRODUCTION AND PURPOSE

This draft audit reviews Sonoma County General Plan 2020 to assess its consistency with State law, internal consistency, and alignment with other planning documents. It provides preliminary recommendations for consideration, aimed at addressing potential inconsistencies, reducing redundancies, ensuring alignment with legal requirements, and reflecting current conditions in the county. These recommendations are not firm policy decisions but serve as a starting point for further discussion and refinement. As a living document, the audit will be updated and adjusted throughout the General Plan update process and will be informed by community engagement and later analysis of existing conditions.

The audit involved a detailed review of all goals, objectives, policies, and implementation programs from General Plan 2020 to assess whether each item should be considered for retention, modification, moved, or flagged for further analysis during the Policy Development Phase (Phase 2). Note during the Policy Development Phase, existing mitigating policies will be reviewed, and environmental review will be conducted to ensure the updated plan addresses potential impacts comprehensively and effectively. The audit also considered potential gaps in the current policy framework and identified areas where new policy guidance may be needed to align with current standards and regulations. Recommendations were informed by current State law requirements, the General Plan Guidelines prepared by the California Office of Planning and Research, best practices, and the collective experience of Permit Sonoma and consultant staff.

This report begins with overarching recommendations that apply throughout the General Plan, as well as recommendations for each element. Following those recommendations, the report presents a summary of the consistency reviews between General Plan 2020 and various County planning documents.



GENERAL PLAN 2020 AUDIT RECOMMENDATIONS

The audit reviewed General Plan 2020's goals, objectives, policies, and implementation programs, for the following elements:

- Land Use Element
- Agricultural Resources Element
- Open Space and Resource Conservation Element
- Water Resources Element
- Circulation and Transit Element
- Air Transportation Element
- Public Facilities and Services Element
- Noise Element

This General Plan 2020 audit memorandum does not include a review of the Public Safety Element because it is currently being updated through a separate process. It also does not cover the Housing Element because it was recently updated through a separate process and adopted in 2023, although this audit does consider consistency of the policy guidance in these elements with that of the 2023 Housing Element, as described in the Consistency Reviews section later in this report.

Overarching Recommendations

State law requires General Plans to address the following elements: land use, circulation and mobility, housing, conservation, open space, noise, safety, and environmental justice. These elements can be combined or presented in any order that best fits the community. Additional elements can be added to the General Plan depending on local needs and goals.

General Plan 2020 covers the elements that are covered by State law, except for environmental justice.

Environmental justice is a relatively new topic required by [California Government Code Section 65302\(h\)](#), often referred to as [Senate Bill 1000 \(2016\)](#). The Environmental Justice Element is currently being prepared through a separate planning process and will be integrated into the



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updated General Plan. With the addition of this new element, the General Plan will address all State-required topics.

While climate change is not identified in State law as a required element, it is required to be addressed in the Safety Element. General Plan 2020 includes limited discussion about climate change and associated hazards. The separate effort to update the Public Safety Element will expand the General Plan’s discussion of climate-related hazards and how the County can adapt to these hazards. However, climate change affects many of the topics covered in other General Plan elements, so it is recommended to add policy guidance throughout the General Plan that supports a reduction in greenhouse gas emissions that contribute to climate change and that provides a framework for adapting to the effects of climate change, as appropriate for the topic.

In addition, General Plans typically present a community-identified vision for the future, which serves as the basis for the policy guidance throughout the plan that works to achieve that vision. General Plan 2020 lacks a single vision statement, so readers must intuit the community vision based on the goals presented throughout the document. A single clear vision statement is not a requirement but can be helpful to convey the overarching vision that underpins the plan.

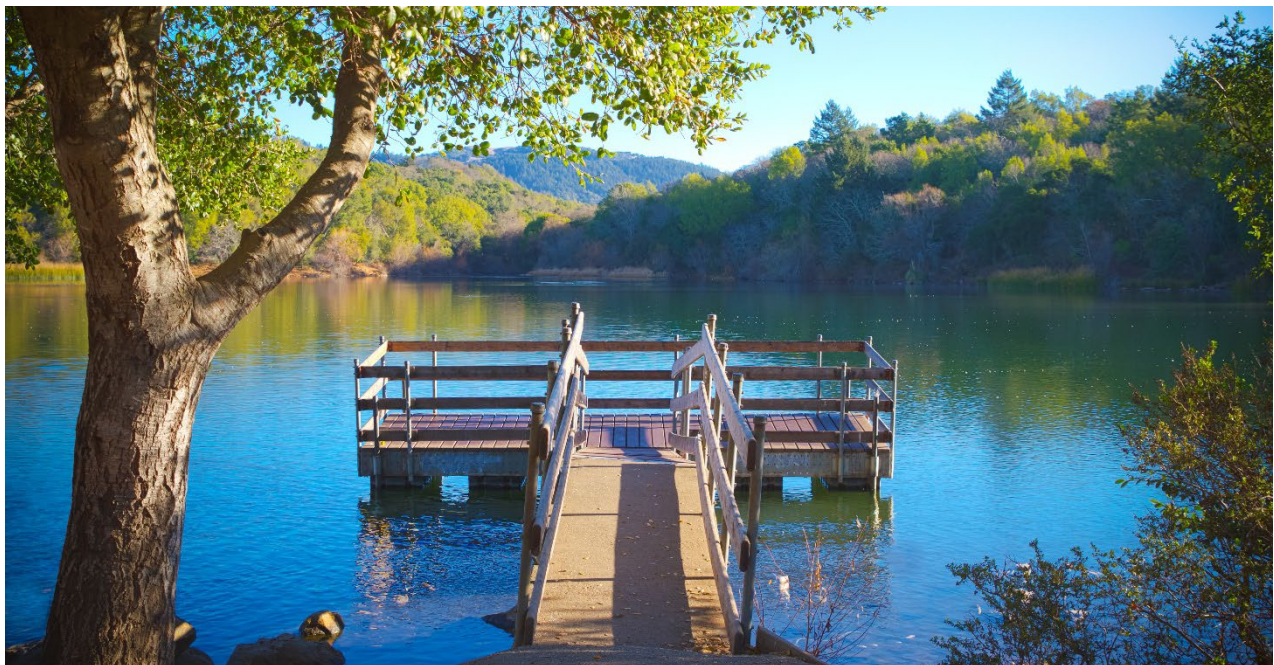


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In addition to these main content considerations, the following overarching recommendations apply throughout General Plan 2020:

- General Plan 2020 is almost 500 pages long. The goals, objectives, policies, and implementation programs provide a structure to the General Plan; however, its layout and organization make it difficult to read and understand. Streamlining, data tabulation, web-friendly design, and other formatting improvements would make the General Plan easier for staff, decision makers, and community members to use. In addition, text could be refined to be clear, succinct, and consistent. In particular, goals, objectives, policies, and implementation programs could be refined to be more distinct from one another and use appropriate wording to align with how these terms are defined.
- Some policies are repeated in multiple elements, creating redundancy and a cumbersome document. It is recommended that policies be stated in only one place; when other sections present related policy guidance, cross-references to those other sections could be included. This will streamline content and make the document easier to use, while also avoiding potential conflicts as the General Plan is amended over time.
- Some policies cross-reference other policies or regulations in the General Plan, the zoning ordinance, or other policy documents by referencing a specific policy number or Code section. Other policies refer to specific State bills or regulations by name or number. Eliminating the use of these specific references would ensure that future updates do not create unintended errors in cross-referenced elements and policy documents.
- Some policy guidance is redundant with other County planning documents. General Plan policy guidance should provide an overarching framework for other County planning documents, but not repeat the same policies that are in those implementing plans. Such policy guidance could be removed or revised to provide the broader framework appropriate for a General Plan.
- Some policy guidance is redundant with State law. Including State law requirements in the General Plan has no effect on their implementation or effectiveness, since the State enforces these requirements regardless of local policy. Meanwhile, including these requirements adds unnecessary bulk to the General Plan, making it harder to use, and creates the potential for conflicts as State laws or local policy are amended over time. However, there are instances when the General Plan must include certain provisions to comply with State General Plan law, as well as instances when a General Plan policy can add nuance to explain how a State law will be implemented in Sonoma County; General Plan policy guidance is appropriate in those instances.
- Some policy guidance falls outside of the County's purview or jurisdiction, which can make it difficult for the County to implement. Such policies could be removed if there is no role for the County. For some, it may be appropriate for the County to work with or encourage outside agencies to pursue the policy intent, in which case the policy should be clear about the limits of the County's role.



- Some policies provide guidance for development projects. It is recommended that policy guidance be clear about whether they apply to all projects, or only discretionary projects. This could be explained in an introduction to the General Plan or each element or specified in each policy as appropriate.
- Some policies and implementation programs have been completed or are no longer relevant and could be removed.
- The County should carefully consider the feasibility of implementing all policies and programs, and only include items that can realistically be implemented. This will provide greater certainty to staff, decision makers, and community members about the effectiveness of the General Plan. An implementation plan to accompany the updated General Plan would also help by prioritizing implementing actions into near-, medium-, and long-term categories. Such a tool increases transparency and certainty for everyone, while providing a helpful tool to staff as it organizes implementation tasks.

The above described the overarching recommendations. More detailed recommendations will be developed throughout the Community Vision Phase and ultimately presented in the form of a matrix for each goal, objective, policy, and implementation program as part of future phases of the General Plan update. It is expected to include columns with recommendations focused on changes recommended to eliminate any internal or external redundancies or conflicts, reflect the project team's current understanding of best practices for General Plan policy guidance, and align with the current policy context in Sonoma County.



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Land Use Element

The Land Use Element, which was last amended in December 2016, outlines where various land use types, such as residential, commercial, industrial, public, agriculture, and natural resources, can be established in the unincorporated areas of Sonoma County. It includes standards for population density and building intensity for these land uses, as well as policies to guide growth and development.



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This element includes policies that apply countywide, as well as policy guidance that is specific to the nine planning areas that encompass the county:

- Sonoma Coast/Gualala Basin
- Cloverdale/Northeast County
- Healdsburg and Environs
- Russian River Area
- Santa Rosa and Environs
- Sebastopol and Environs
- Rohnert Park – Cotati and Environs
- Petaluma and Environs
- Sonoma Valley



The following provides a summary of the preliminary recommendations for the Land Use Element :

- Much of the policy guidance in the Land Use Element is redundant with other parts of the General Plan, the Local Coastal Plan, various Area Plans, and the zoning ordinance, making this a very long element with almost 400 individual goals, objectives, policies, and implementation programs. Internally redundant items could be removed from the Land Use Element, or the corresponding guidance in other parts of the General Plan could be removed, with cross-references added. Local Coastal Plan redundancies could be removed since the Local Coastal Plan serves as the General Plan for the Coastal Zone, as described further in the Consistency Reviews section later in this audit. Area Plan and zoning ordinance redundancies could be removed, or the policy guidance could be broadened to provide a framework for the Area Plan policy or zoning regulation.
- Similarly, some policy guidance establishes standards that are at a level of detail that is more appropriate for an Area Plan, the zoning ordinance, or other implementing policy document. Such guidance could be removed, with corresponding updates to those implementing documents if needed, or broadened to provide a more appropriate level of detail.
- Some policies provide direction for how and where to apply land use designations in the land use map. These policies will be addressed through the update to the land use map that will happen as part of the General Plan update. Once addressed in the land use map, they could be considered complete and removed as standalone policies.
- Some policy guidance refers to individual parcels, intending for the guidance to only apply to those parcels, which provides a higher degree of detail than is appropriate for the General Plan. The County could consider revising or relocating these policies to an Area or Specific Plan, if there is one for the site, or to the zoning ordinance or another implementing policy document to maintain a broad level of policy guidance appropriate for the General Plan.
- As part of the General Plan update, the County could consider whether the planning area boundaries are still appropriate. Based on localized guidance established in Area and Specific Plans and Design Guidelines, as well as input and direction from community



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members and current conditions in the county, adjustments to these boundaries may be warranted. See also the Consistency Reviews discussion of Area and Specific Plans later in this audit.

- General Plan 2020 identifies Urban Service Boundaries (USB) and maps the desired extent of each USB. Many policies in the Land Use Element reference USB boundaries when providing land use direction. As part of the General Plan update, the County could reevaluate the USBs to ensure they accurately reflect the County's desired growth management goals, considering community input and direction and technical considerations, such as service and infrastructure capacities.
- The Land Use Element should include policy guidance to ensure land uses support military readiness activities carried out on military bases, installations, and operating and training areas (e.g., the US Coast Guard Training Center outside Petaluma), consistent with [California Government Code Section 65302\(a\)\(2\)](#).

Agricultural Resources Element

The Agricultural Resource Element, which was last amended in August 2016, provides a comprehensive policy framework for agriculture, which it defines as an industry that produces and processes food, fiber, and plant materials, and that includes the raising and maintaining of farm animals, including horses, donkeys, mules, and similar livestock. The element addresses the marketing and promotion of agricultural products, stabilization of agriculture at the urban fringe, and mitigation of conflicts between agricultural and nonagricultural uses. The element also provides guidance related to the intensity and location of agriculture-related support and visitor-serving uses, farmworker housing, the agricultural economy, permit processing for agricultural activities, and the aquaculture and horse industries. Through this policy guidance, the element aims to support the stability and productivity of the county's agricultural lands and industries and provide clear guidelines for decisions in agricultural areas.

The following provides a summary of the preliminary recommendations for the Agricultural Resources Element:

- Many policies in the Agricultural Resources Element have already been addressed through amendments to the zoning ordinance and could be removed. Others that have not already been incorporated into the zoning ordinance are more appropriate as a zoning or subdivision regulation and could be moved to the zoning or subdivision ordinance. Such policies could be replaced with broader guidance to provide a framework for these regulations.
- Policy guidance related to aquaculture and commercial fishing are ocean-dependent uses in the Coastal Zone and could be removed.



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- Topics covered in the Agricultural Resources Element have historically been major topics of concern; therefore, it is recommended that they be discussed with community members to confirm policy approaches align with current community preferences, including balancing visitor-serving, processing, and cultivation functions; promoting agricultural land preservation; managing potential conflicts between agricultural and nonagricultural activities; and addressing overconcentration. The General Plan update process could include data collection and analysis related to these topics to support the community discussion.



Open Space and Resource Conservation Element

The Open Space and Resource Conservation Element, which was last amended in August 2016, outlines a policy framework for preserving open spaces, protecting natural and cultural resources, and providing outdoor recreational opportunities. The element addresses a broad range of related topics, including scenic resources; biotic resources; soil resources; timber resources; energy resources; air quality; outdoor recreation; and archaeological, cultural, and historic resources. The element designates open space under several types of classifications, including Community Separators, Scenic Landscape Units, Scenic Corridors, Biotic Habitat Areas, and Riparian Corridors. In conjunction with the Water Resources and Agricultural Resources Elements, the element provides a comprehensive framework for managing and preserving open space and natural resources while enhancing recreational opportunities.

The following provides a summary of preliminary recommendations for the Open Space and Resource Conservation Element:

- There are policies in the Open Space and Resource Conservation Element already addressed in the zoning ordinance and other County Code sections. While these policies could be removed, those ensuring consistency with voter-approved measures should be retained. Other policies have not yet been addressed in the Code but would be appropriate to move to Code regulations. However, adding broad policy statements to provide a framework for some of these regulations would be appropriate.
- Policy guidance related to coastal resources are addressed by the Local Coastal Plan and could be removed.
- Some policies in this element are redundant with State law requirements under CEQA and could be removed.
- Some policy concepts are parsed into narrow goals that could be combined to reduce bulk and remove redundancies.
- Policy guidance related to parks and recreation could be consolidated with similar policy guidance in the Public Facilities and Services Element. Similarly, policy guidance related to bikeways could be moved to the Circulation and Transit Element.
- Policy guidance related to greenhouse gas emissions will need to be updated to align with current State law, best practices, and the pending updates to the Public Safety Element.
- New and revised policy guidance should be considered to meet the requirements of [Senate Bill 1425](#) (2022), which requires open space elements to include climate resilience, equity, and other benefits of open space. New and revised policy guidance should support the following:
 - Equitable access to open space, which should be aligned with the Environmental Justice Element



- Climate resilience and other co-benefits of open space, which should be aligned with the Public Safety Element
- Rewilding opportunities, which should be aligned with the Land Use Element
- Senate Bill 18 (2004) requires the County to provide tribes notice at certain key points in the planning process, and to consult with tribes on general plan adoption or amendment to aid in the protection of traditional tribal cultural places through local land use planning. The bill, inclusive of [California Government Code Section 65352](#), et seq., also requires the County to accurately identify those areas needing protection and to protect the confidentiality and dignity of sensitive resources. The County should engage Native American tribes early in the General Plan update process, consistent with Senate Bill 18.
- On a related note, [Assembly Bill 52](#) (2014) adds “tribal cultural resources” to the specific cultural resources protected under CEQA, and it requires lead agencies to notify relevant tribes about development projects. It also mandates lead agencies to consult with tribes if requested and sets the principles for conducting and concluding consultation. While this law is focused on the CEQA process and there are no legal requirements for General Plan content regarding tribal cultural resources, additional guidance regarding tribal consultation, relationship building, and respect for tribal cultural resources would support the County’s ability to fulfill its obligations under this law.





Water Resources Element

The Water Resources Element was adopted in September 2008 and acknowledges the critical role of water in Sonoma County's environment, economic stability, agricultural protection, and quality of life. The element includes policies that address water quality, groundwater, public water systems, conservation and reuse, importing and exporting, and watershed management, with the overall goal of sustaining and protecting Sonoma County's water resources.



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The following provides a summary of the preliminary recommendations for the Water Resources Element:

- Some policies in the Water Resources Element are redundant with other water conservation planning documents and regulations, including the Water Efficient Landscaping Ordinance, Green Building Standards, and Low Impact Design Guidelines, and could be removed.
- Some policies in this element are redundant with State law requirements under CEQA and could be removed.
- Some policies overlap with each other, causing redundancies and unnecessary bulk. Such policies could be combined and simplified to streamline content.
- Policy guidance will need to be aligned with the updated Public Safety Element to expand guidance related to climate change hazards, including drought.



- Consistent with the [Sustainable Groundwater Management Act](#), the County should coordinate with groundwater sustainability agencies to ensure the updated element supports groundwater sustainability plans. Updates are needed to some existing policy guidance to support consistency with this State law.
- Water resource management is a major topic of concern for community members and will require focused engagement. The General Plan update process could include data collection and analysis to support the community discussion about water resources.

Circulation and Transit Element

The Circulation and Transit Element, which was last amended in August 2016, outlines the location and extent of existing and planned transportation routes and facilities for Sonoma County. The element provides a policy framework to support the mobility of residents, businesses, and visitors, with policies that address the circulation and transit system, public transit, bicycle and pedestrian transportation, the countywide highway system, passenger and freight rail, and phasing and funding of improvements. The element also includes circulation and transit policies specific to the nine planning areas listed earlier in the Land Use Element section.



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The following provides preliminary recommendations for the Circulation and Transit Element:

- Many policies and implementation programs in the Circulation and Transit Element have been completed and could be removed.
- Some policies overlap with each other or cover related topics, causing redundancies and unnecessary bulk. Such policies could be combined and simplified to streamline content.
- Much of the policy guidance for individual planning areas is recommended to be moved to other sections, consolidated with related policy guidance, or deleted because it is no longer relevant or the task has been completed. If these recommendations are implemented, the County should consider whether to retain policy guidance specific to individual planning areas; providing countywide policy guidance for this topic may be adequate and help to streamline the content. However, the planning area geography would still be a helpful framework for presenting the relatively detailed planned roadway and highway improvements and highway classification maps.
- Policy guidance could be updated to account for current transportation technologies, such as electric vehicle charging stations and micromobility.
- As described later in the Air Transportation Element section, consider merging the content from that element into the Circulation and Transit Element.
- [Senate Bill 743](#) (2013) changed the way that transportation impacts are evaluated under CEQA. Prior to this bill, transportation impact analyses were based on whether a project would contribute to traffic congestion. Now, transportation impacts are based on how the project would impact vehicle miles traveled (i.e., a measure of how many miles vehicles would be driven based on the uses anticipated in the project). While Senate Bill 743 does not eliminate the ability of local agencies to continue to consider congestion as a metric for planning, it places an emphasis on the overarching goal of reducing greenhouse gas emissions through the application of the vehicle miles traveled metric. Senate Bill 743 is also intended to encourage infill development, discourage greenfield development, and make non-automobile modes safer and more reliable. Some policy guidance in the Circulation and Transit Element may need revision to support these concepts.
- [Senate Bill 932](#) (2022) requires that the Circulation and Transit Element incorporate principles of the Federal Highway Administration's Safe System Approach by including policies that aim to eliminate fatal and serious injuries for all road users through a holistic

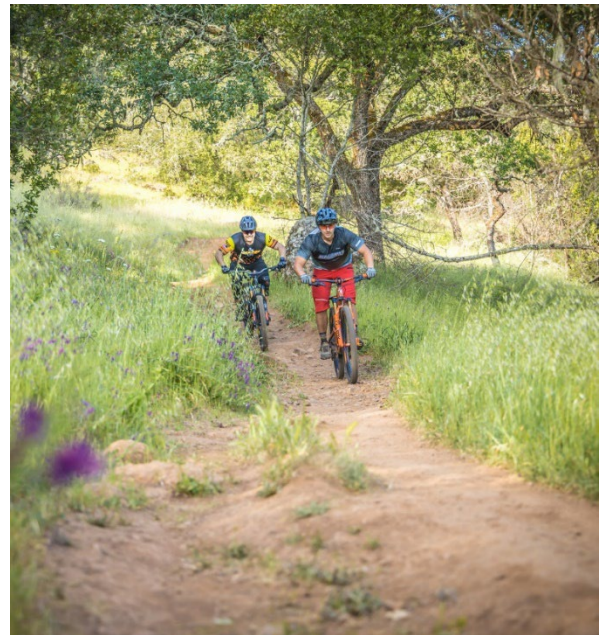


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view of the roadway system, including provisions that account for human error, recognize vulnerable road users, and promote redundant and proactive safety measures. The Sonoma County Transportation Authority has prepared a [Vision Zero Action Plan](#) that supports these concepts. Policy guidance in the Circulation and Transit Element should be refined to support the Vision Zero Action Plan and comply with Senate Bill 932. To support this consistency, transportation safety-related policy guidance could be consolidated into a Vision Zero goal.

Air Transportation Element

The Air Transportation Element, which was last amended in January 2012, outlines policies related to land use compatibility around airports, airspace protection and protection of adjacent community areas, general aviation, scheduled air carrier services, non-aviation, and accessory uses. The element considers the types and amounts of aviation activities to be accommodated at Sonoma County airports, including the Charles M. Schulz - Sonoma County Airport, and the facilities needed to serve them.

The following provides a summary of preliminary recommendations for the Air Transportation Element:

- Some policies in the Air Transportation Element are redundant with Federal Aviation Administration standards and the Sonoma County Comprehensive Airport Land Use Plan and could be removed.
- Some policy guidance is at a level of detail more appropriate for the 2011 Charles M. Schulz - Sonoma County Airport Master Plan. It is recommended that the General Plan only provide a framework for the policy guidance contained in this separate plan. Such policies could be broadened to provide a more appropriate level of guidance or turned into a general program identifying the need for an update to the Airport Master Plan to reflect the guidance.
- To streamline the General Plan, the remaining policy content could be incorporated into the Circulation and Transit Element, eliminating this element all together. Such policy guidance could be included in a new section related to the airport.



Public Facilities and Services Element

The Public Facilities and Services Element, which was last amended in August 2016, addresses public services related to the physical development of the county, including water and sewer, parks and recreation, public education, fire protection, solid waste, public utilities, and youth and family services. It aims to provide a framework for decision-making about these services while integrating public service concerns into land use planning.

The following provides a summary of preliminary observations and recommendations for the Public Facilities and Services Element:

- Some policies in the Public Facilities and Services Element are redundant with established County procedures or State law and could be removed.
- Revise policies as needed to clarify the extent of County purview or jurisdiction to effectuate the policy, as needed, and particularly where more than one jurisdiction is involved.
- The policy guidance under Goal PF-3, which relates to youth and family issues, will need to be aligned with the Environmental Justice Element that is current in development.
- Policy guidance related to parks and recreation could be consolidated with similar policy guidance in the Open Space and Resource Conservation Element.
- To provide more structure to the policy framework and make it easier for the user to navigate this element, some policy guidance could be split into sections focused on individual services. For example, Goal PF-2 covers parks and recreation, public education, fire suppression and emergency medical service, solid waste service, and public utility sites; guidance for these topics could be grouped by service type.



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Noise Element

The Noise Element, which was last amended in October 2012, addresses existing and future noise conditions, land use compatibility, and management of transportation-related noise. This element includes policies and standards to ensure noise compatibility in current and future land development.

The following provides a summary of preliminary recommendations for the Noise Element:

- Some Noise Element policy guidance is redundant with other established County procedures or State law and could be removed.
- Some policy guidance would be more appropriate in a noise ordinance, which is called for as an implementation program but not yet prepared. This policy guidance could be incorporated into the implementation program about the future noise ordinance.
- The Noise Element contains limited guidance related to vibration. The County could consider adding new policy guidance to protect sensitive uses from ground borne vibration.
- Because noise is a relatively narrow topic, the County could consider incorporating the content from this element into the Public Safety Element as a discrete section on noise. This would help to streamline the updated General Plan.



CONSISTENCY REVIEWS

Part of the process to prepare this audit involved reviewing General Plan 2020 for consistency with other County planning documents, including the 2023 Local Coastal Plan, 2023 Housing Element, Area and Specific Plans, Local Area Design Guidelines, and Historic District Design Guidelines. These consistency reviews are intended to identify instances where implementation of a General Plan policy would not align with or would be redundant with the goals or policies of these other planning documents. Alignment reduces the risk of conflicting policies or development standards that could lead to confusion, delays, or disputes and helps communities achieve their long-term goals more efficiently by coordinating resources and decision-making. Meanwhile, removing redundancies makes the planning documents easier to use for staff, decision-makers, and the public, and avoids the potential for future conflicts when amendments are made.

This section describes the County planning documents that were part of the consistency review, along with the approach to and considerations for the review. General findings from each review are presented in this section.

2023 Local Coastal Plan

The Local Coastal Plan is required under the California Coastal Act and governs lands in the Coastal Zone, which is defined in the California Coastal Act and mapped by the State and includes lands in Sonoma County. It can be considered the General Plan for the area in the Coastal Zone. A jurisdiction's General Plan is required to be consistent with the Local Coastal Plan. As a general rule, goals and policies contained in a Local Coastal Plan supersede those of a County General Plan for lands in the Coastal Zone.



The consistency review considers goals, objectives, policies, and implementation programs in the Sonoma County General Plan that are inconsistent with, overlap, or are no longer relevant because of the Local Coastal Plan. Much of the policy guidance in the two plans provides direction that does not directly overlap with the other plan. For these policy items, it is assumed their application would only be to the Coastal Zone or rest of the county without risk of conflict between the two plans. The consistency review analysis flags goals, objectives, policies, and implementation programs based on the following criteria:

- General Plan policy guidance that references lands and features in the Coastal Zone, including the Sonoma coast, Gualala Basin, Pacific Ocean or coast, coastal bluffs, Coastal Zone communities, Highway 1, major riparian corridors, and other built and natural features specific to the Coastal Zone.
- General Plan policy guidance that establishes development standards for certain features that would be superseded by Local Coastal Plan development standards for those same features in the Coastal Zone, including scenic routes and riparian corridors.



Land Use Designations Review

The Local Coastal Plan uses land use designations that correspond with County coastal zoning districts. Many Local Coastal Plan land use designations share the same names as the current General Plan land use designations, but the Local Coastal Plan provides its own standards for each land use, including the purpose, principally permitted uses, minimum parcel sizes, residential densities, and other designation criteria. Table 1 summarizes the Local Coastal Plan land use designations, corresponding coastal zoning districts, and related General Plan land use designations. There is no inconsistency between the land use designations in the General Plan and Local Coastal Plan because they apply to different parts of the county.

Table 1. Local Coastal Plan Land Use Designations

Local Coastal Plan Land Use Designation	Corresponding Coastal Zoning District	Related General Plan Land Use Designation*
Land Extensive Agriculture (LEA)	Land Extensive Agriculture (LEA)	Land Extensive Agriculture (LEA)
Diverse Agriculture (DA)	Diverse Agriculture (DA)	Diverse Agriculture (DA)
Recreation (R)	Planned Community (PC) Resources and Rural Development (RRD)	Resources and Rural Development (RRD) Rural Residential (RR) and Urban Residential (UR) (for recreation areas in planned communities)
Resources and Rural Development (RRD)	Resources and Rural Development (RRD)	Resources and Rural Development (RRD)
Timber (T)	Timber Preserve (TP) Resources and Rural Development (RRD)	Resources and Rural Development (RRD)
Open Space (OS)	Planned Community (PC) Rural Residential (RR)	Rural Residential (RR) (for dedicated open space areas in planned communities)
Commercial Fishing (CF)	Commercial Fishing (CF)	n/a
Commercial Tourist (CT)	Commercial Tourist (CT) (formerly Visitor-Serving Commercial)	Recreation and Visitor Serving Commercial (RVSC)



Local Coastal Plan Land Use Designation	Corresponding Coastal Zoning District	Related General Plan Land Use Designation*
Commercial Services (CS)	Commercial Services (CS) (formerly Rural Services) Community Commercial (C2)	Limited Commercial (LC)
Public Facilities (PF)	Public Facilities (PF)	Public/Quasi Public (PQP)
Rural Residential (RR)	Rural Residential (RR) Agriculture and Residential (AR) Planned Community (PC)	Rural Residential (RR)
Urban Residential (UR)	Low Density Residential (R1) Medium Density Residential (R2) Planned Community (PC)	Urban Residential (UR)

** Though this table lists General Plan land use designations that are related to the Local Coastal Plan land use designations, this correspondence is superficial since the Local Coastal Plan establishes its own land use standards. The Local Coastal Plan implements its land use designations through the Coastal Zoning Code (Chapter 26C of the Sonoma County Zoning Regulations). The related General Plan land use designations were identified using Chapter 26, Article 1.*

Policy Review

The Local Coastal Plan overlaps with a few of the Planning Areas in the Land Use Element. The majority of the Coastal Zone in Sonoma County is in the Sonoma Coast/Gualala Basin Planning Area, which also includes inland areas that are not in the Coastal Zone. It appears that the 2023 Local Coastal Plan incorporated many General Plan objectives and policies and updated their language to reflect current conditions, particularly the General Plan Land Use Element policies under Section 3.1 for Sonoma Coast/Gualala Basin. Therefore, many of these General Plan policies could be considered for removal or refinement to only cover areas outside the Coastal Zone.

Small portions of the Coastal Zone overlap with two other areas of the county for which the General Plan Land Use Element includes specific sections and policy guidance. Objectives and policies under Sections 3.4 (Russian River Area) and 3.6 (Sebastopol and Environs) may be superseded by or need to be coordinated with the Local Coastal Plan for lands that are in the Coastal Zone. However, the vast majority of these two Planning Areas includes inland areas that are not in the Coastal Zone, so this could be addressed with a simple explanation in the narrative of the General Plan.



Photo credit: Adrian Tamblin

The Local Coastal Plan identifies and maps Scenic Landscape Units and Scenic Corridors in the Coastal Zone and contains policies related to scenic resources in the Coastal Zone. Similarly, the Local Coastal Plan identifies and maps riparian corridors, lagoons, and estuaries in the Coastal Zone and contains policies for protecting riparian corridors, including stream conservation areas in the Coastal Zone. Identification

of resources in the Coastal Zone and policy guidance to protect those resources should be housed in the Local Coastal Plan; General Plan 2020 mapping and policy guidance could be refined to remove content that is specific to the Coastal Zone.

2023 Housing Element

The Housing Element provides a detailed statement of housing goals, objectives, policies, and implementation programs for the unincorporated county. The element is based on a comprehensive technical assessment of existing housing policies and programs and community input, and includes the following components:

- Current and projected housing needs, especially related to low-income households and special-needs populations
- An inventory of sites available for housing construction
- An analysis of market, environmental, governmental, and other factors that constrain housing production
- An assessment of new programs and policies that can enhance housing production in the county



Photo credit: Adrian Tamblin

The Housing Element sets forth how the County will address the need for housing, especially for low- and moderate-income families and special-needs families and individuals.

As noted earlier in this report, the Housing Element is part of General Plan 2020 but was recently updated through a separate process to meet the State’s statutory deadline for updating this element. Therefore, the analysis considered consistency between the other elements of General Plan 2020 with this recently adopted Housing Element.

Housing Element Sites Inventory Review

The Housing Element Sites Inventory was evaluated for consistency with General Plan 2020 planning area-specific goals and policies. The Sites Inventory identifies sites to accommodate housing in six of the nine planning areas, listed below. No inconsistencies were found.

- **Planning Area 2, Cloverdale/Northeast County:** The Housing Element identifies sites in the USB of Geyserville. The selection of these sites is consistent with Land Use Element Policies under Section 3.2, Cloverdale/Northeast County.
- **Planning Area 4, Russian River Area:** The Housing Element identifies sites in the USBs of Guerneville and Forestville. The selection of these sites is consistent with Land Use Element Policies under Section 3.4, Russian River Area.



- **Planning Area 5, Santa Rosa and Environs:** The Housing Element identifies sites in the USBs of Larkfield-Wikiup and South Santa Rosa. The selection of these sites is consistent with Land Use Element Policies under Section 3.5, Santa Rosa and Environs.
- **Planning Area 6, Sebastopol and Environs:** The Housing Element identifies sites in the USB of Graton. The selection of these sites is consistent with Land Use Element Policies under Section 3.6, Sebastopol and Environs.
- **Planning Area 7, Rohnert Park-Cotati:** The Housing Element identifies sites in the USB of Penngrove. The selection of these sites is consistent with Land Use Element Policies under Section 3.7, Rohnert Park-Cotati.
- **Planning Area 9, Sonoma Valley:** The Housing Element identifies sites in the USBs of Aqua-Caliente and City of Sonoma, along with two sites that are part of the Sonoma Developmental Center Specific Plan. The selection of these sites is consistent with Land Use Element Policies under Section 3.9, Sonoma Valley.

Policy Review

No inconsistencies were found between the policy guidance in General Plan 2020 and the Housing Element. The two documents share and overlap in several policy topics. In some policy topics, one document contains more robust policies than the other, whereas in other policy topics, each document has goals and policies that appear to address the topic from different angles. However, they are not inconsistent with each other.

The Housing Element recognizes the community intent of the General Plan to concentrate growth in the county's urban centers and preservation of agricultural and open space lands. It acknowledges specific County programs and measures, such as the Community Separators and Measure K, as the guardrails within which it should develop its policies and programs. As a result, the Housing Element prioritizes infill development in USBs or where an Area or Specific Plan has been adopted as the primary strategy for fulfilling the county's housing needs.

Area and Specific Plans

Area and Specific Plans provide policy guidance for focused geographic areas to reflect localized conditions and issues. There are seven adopted Area Plans and two adopted Specific Plans, one of which is in the process of being updated. A third new Specific Plan is also in development.



The consistency review identifies potential inconsistencies between General Plan 2020 and the Area and Specific Plans based on the following criteria:

- Instances where an Area or Specific Plan land use designation is defined differently or contains additional standards compared to General Plan land use designations.
- Instances where implementation of a General Plan policy could present a conflict with the goals or policies of an Area or Specific Plan or vice versa.
- Instances where development guidelines and standards for a shared topic or issue, such as scenic corridors and riparian corridors, are different between the General Plan and Area or Specific Plan.

Table 2 provides an overview of the Area and Specific Plan consistency review findings. As indicated in the table, the consistency review does not cover the two Specific Plans that are currently in development.

Table 2. Area and Specific Plan Consistency Overview

Area or Specific Plan	Audit Overview
Airport Industrial Specific Plan	<ul style="list-style-type: none"> ● This Specific Plan was not included in the consistency review because it is currently being updated.
Bennett Valley Area Plan	<ul style="list-style-type: none"> ● No inconsistencies with the General Plan. ● Some policies may be affected by the General Plan update.
Franz Valley Area Plan	<ul style="list-style-type: none"> ● No major inconsistencies with the General Plan. ● The Franz Valley Area Plan encourages potentially higher densities of residential development than allowed in the General Plan land use map, although acknowledges that these would require a General Plan amendment. ● Franz Valley Area Plan riparian corridor policies vary from and are potentially more restrictive than what the General Plan requires.
Pennygrove Area Plan	<ul style="list-style-type: none"> ● No major inconsistencies with the General Plan. ● Pennygrove Area Plan riparian corridor policies vary slightly from what the General Plan requires.
Petaluma Dairy Belt Area Plan	<ul style="list-style-type: none"> ● No major inconsistencies with the General Plan. ● Petaluma Dairy Belt Area Plan text references scenic corridors, but neither the text nor the map clearly identifies scenic corridors. ● Petaluma Dairy Belt Area Plan riparian corridor policies vary slightly from what the General Plan requires.
Springs Specific Plan	<ul style="list-style-type: none"> ● This Specific Plan was not included in the consistency review because it is currently being developed.



Area or Specific Plan	Audit Overview
Sonoma Developmental Center Specific Plan	<ul style="list-style-type: none"> • No inconsistencies with the General Plan.
Sonoma Mountain Area Plan	<ul style="list-style-type: none"> • No major inconsistencies with the General Plan. • Eastern expansion of City of Rohnert Park identified as key concern in the plan; relates to General Plan policies regarding urban service expansion. • Sonoma Mountain Area Plan scenic corridor and riparian corridor policies are subjective and do not have objective standards compared to the General Plan policies.
South Santa Rosa Area Plan	<ul style="list-style-type: none"> • No major inconsistencies with the General Plan. • Includes a non-General Plan land use called “Urban Reserve.” • The South Santa Rosa Area Plan identifies the Todd Road extension to Highway 116 as a key concern that could impact the Laguna de Santa Rosa riparian corridor, which is a potential issue for the General Plan update to consider. • The plan identifies some scenic corridors that are not shown in General Plan Figure OSRC-1, Scenic Resources Areas. • Riparian corridor policies vary slightly from what the General Plan requires.
West Petaluma Area Plan	<ul style="list-style-type: none"> • No major inconsistencies with the General Plan. • West Petaluma Area Plan scenic corridor and riparian corridor policies vary slightly from what the General Plan requires.

As described earlier in the General Plan 2020 Audit Recommendations for the Land Use Element, General Plan 2020 divides the county into nine planning areas, with policy guidance specific to each planning area. To support this consistency analysis, Table 3 indicates the planning areas within which each Area or Specific Plan is located. Nearly all Area Plans extend into multiple planning areas. If planning area boundary changes are considered as part of the General Plan update, adjustments could be made to encompass each Area and Specific Plan in a single planning area.



Table 3. General Plan 2020 Planning Area and Area and Specific Plan Correspondence

Area or Specific Plan	General Plan Planning Area
Bennett Valley Area Plan	Planning Area 5: Santa Rosa and Environs Planning Area 9: Sonoma Valley (southern tip of the Bennett Valley Area Plan)
Franz Valley Area Plan	Planning Area 2: Cloverdale/Northeast County Planning Area 3: Healdsburg and Environs Planning Area 5: Santa Rosa and Environs
Penngrove Area Plan	Planning Area 7: Rohnert Park-Cotati and Environs Planning Area 8: Petaluma and Environs (southern tip of the Penngrove Area Plan)
Petaluma Dairy Belt Area Plan	Planning Area 1: Sonoma Coast/Gualala Basin (western tip of the Petaluma Dairy Belt Area Plan) Planning Area 6: Sebastopol and Environs Planning Area 7: Rohnert Park-Cotati and Environs (northeastern tip of the Petaluma Dairy Belt Area Plan) Planning Area 8: Petaluma and Environs
Sonoma Developmental Center Specific Plan	Planning Area 9: Sonoma Valley
Sonoma Mountain Area Plan	Planning Area 7: Rohnert Park-Cotati and Environs Planning Area 8: Petaluma and Environs Planning Area 9: Sonoma Valley (several parcels at eastern tip of the Sonoma Mountain Area Plan)
South Santa Rosa Area Plan	Planning Area 5: Santa Rosa and Environs Planning Area 7: Rohnert Park-Cotati and Environs (several southern parcels of the South Santa Rosa Area Plan)
West Petaluma Area Plan	Planning Area 8: Petaluma and Environs



The following sections present an overview of each Area and Specific Plan that was considered in the consistency review, followed by the findings of the review.

Bennett Valley Area Plan

Adopted 1979, last amended 2011

Purpose

The Bennett Valley Area Plan provides land use and open space guidance for the 15,500-acre Bennett Valley Study District southeast of the City of Santa Rosa. The goals and policies aim to maintain a rural landscape that prioritizes open space, conservation, agriculture, scenic qualities, and low-intensity residential development where allowed.

Land Use Designations

The Bennett Valley Area Plan uses General Plan land use designations in its land use plan, specifically the Rural Residential, Diverse Agriculture, Land Intensive Agriculture, and Resources and Rural Development designations. There are no inconsistencies between the Bennett Valley Area Plan and General Plan Land Use designations.

Policies

There are no inconsistencies between the Bennett Valley Area Plan and General Plan policies. However, the Bennett Valley Area Plan states that in instances where there are conflicts between the Bennett Valley Area Plan and General Plan, the more restrictive policy would apply.

- Several Bennett Valley Area Plan policies are noted here for further analysis, including an analysis of the scope or nature of projects that would fall under the policies. Such an analysis will assist in formulating policy recommendations.
- Section VI, Circulation, Policy 1, which states the character of the existing public road system shall be retained but allows improvements in the interest of safety.
- Section IX, Transportation, references four General Plan Circulation and Transit Element recommendations to serve as standards for roads in Bennett Valley:
 1. All roads should receive maintenance and hazard correction as the need arises.
 2. Some roads may need to be upgraded because of safety or structural deficiencies. Proposals for major safety upgrades should be thoroughly reviewed before specific projects are undertaken, including citizen review.
 3. All roads should be retained in their basic rural character.



4. Petaluma Hill Road is designated for three lanes where necessary to provide access from side streets, driveways, etc.

Development Guidelines

The Bennett Valley Area Plan Development Guidelines establish standards and procedure for development in the study area, including establishment of a Design Review Committee, standards for approval, and guidelines for building design, architecture, and site design. There are no inconsistencies between the Bennett Valley Area Plan Development Guidelines and the General Plan. However, the Bennett Valley Area Plan states that in instances where the Bennett Valley Area Plan Development Guidelines conflict with the General Plan, the General Plan policies would apply.

Franz Valley Area Plan

Adopted 1979, last amended 2012

Purpose

The Franz Valley Area Plan (FVAP) provides land use and open space guidance for 91,520 acres of land in the northeastern part of Sonoma County, northeast of the City of Santa Rosa, and east of the City of Healdsburg. The goal of the Franz Valley Area Plan is to protect and maintain the Plan Area primarily as open space, resource conservation, and agriculture with limited residential development.

Land Use Designations

The Franz Valley Area Plan uses General Plan land use designations in its land use plan, specifically the Resources and Rural Development, Rural Residential, Land Intensive Agriculture, Land Extensive Agriculture, and Diverse Agriculture categories. There are no major inconsistencies between the Franz Valley Area Plan and the General Plan land use designations. However, the Franz Valley Area Plan deviates slightly from the General Plan by encouraging a range of residential densities in some areas, recognizing that suitability, constraints, and sensitivities may vary, whereas the General Plan Land Use map establishes a single maximum allowed density for each area of the map. The density ranges recommended in the Franz Valley Area Plan for several areas are higher than what the General Plan allows. However, the Franz Valley Area Plan states that any projects proposing a density higher than the General Plan would require a General Plan Amendment. The General Plan update could consider whether to increase the maximum allowed density in areas that the Franz Valley Area Plan allows a higher-density range.



Policies

The Franz Valley Area Plan contains policies for land use, agriculture, open space, public safety, scenic resources, biological resources, and resource conservation. There are no major inconsistencies between Franz Valley Area Plan policies and General Plan policies. However, the FVAP states that in instances where there are inconsistencies between the Franz Valley Area Plan and General Plan, the more restrictive policy shall apply.

Included among its scenic resource policies, the Franz Valley Area Plan contains policies for development along scenic routes. Policy 1 in the Scenic Routes, Vista Points, and Bicycle Routes section of its Open Space Plan requires a building setback of 30 percent of the depth of the lot (a maximum of 200 feet from the centerline of the road) along scenic routes, which is consistent with General Plan Policy OSRC-3c.

The Franz Valley Area Plan identifies the following roads as scenic routes in the Plan Area. These are consistent with the Scenic Routes shown in General Plan Figure OSRC-1, Scenic Resource Areas:

- Highway 128
- Chalk Hill Road
- Franz Valley Road
- Porter Creek Road
- Petrified Forest Road
- Calistoga Road
- St. Helena Road

The Franz Valley Area Plan contains a mitigation measure regarding a specific transmission line that was proposed at the time of the plan's writing. Energy Mitigation Measure 2 in the Constraints and Mitigation Measures section states: "The County of Sonoma should continue to oppose the proposed Geysers to Lakeville transmission line because it is not consistent with the policies of this plan." This mitigation measure is noted here in the event it is relevant for this General Plan update.

The Franz Valley Area Plan designates riparian corridors that vary from and are potentially more restrictive than the General Plan riparian corridor policies:

- Franz Valley Area Plan riparian corridor policies: Riparian corridors of two widths have been designated on the Open Space Plan Map.
 - Major riparian corridors, with a 200-foot setback from the stream bank, have been designated according to the following criteria:
 - a. If already a designated major riparian corridor in the General Plan
 - b. If slope is greater than 50 percent (many creeks)



- c. If there are redwood groves (many creeks)
 - d. If there are known archaeological sites (Little Briggs Creek)
 - e. If stream channel is wide (Brooks Creek)
- Minor riparian corridors have a 100-foot setback and include all other creeks in the Plan Area. A 100-foot setback is critical in affording minimal protection to not only the riparian setting but to archaeological sites, which are frequently distributed near water sources. A riparian corridor helps maintain healthy aquatic habitat. Erosion and elimination of shade-producing vegetation due to development too close to a stream are the major causes of stream degradation. Loss of riparian vegetation contributes to the loss of many wildlife species. Riparian vegetation also provides aesthetic enhancement and shade for stream banks.
- General Plan Policy OSRC-8b: Establish streamside conservation areas along both sides of designated Riparian Corridors as follows, measured from the top of the higher bank on each side of the stream as determined by PRMD [i.e., Permit Sonoma]:
 1. Russian River Riparian Corridor: 200 feet
 2. Flatland Riparian Corridors: 100 feet
 3. Other Riparian Corridors: 50 feet

As noted above, where there are inconsistencies between the Franz Valley Area Plan and General Plan, the FVAP states the more restrictive policy shall apply.

Penngrove Area Plan

Adopted 1984, last updated 2008

Purpose

The Penngrove Area Plan provides land use policies for the community of Penngrove northwest of the City of Petaluma and southeast of the City of Rohnert Park. The Penngrove Area Plan states the following priorities of the plan:

1. Preserve the small-town lifestyle in the community of Penngrove.
2. Accommodate a variety of rural living environments while protecting agriculture and recognizing septic and water constraints.
3. Mitigate traffic impacts.
4. Preserve the area's scenic beauty.



Land Use Designations

The Penngrove Area Plan uses General Plan land use designations in its land use plan. Specifically, it uses the Rural Residential, Diverse Agriculture, Limited Commercial, General Commercial, Limited Industrial, and Public/Quasi-Public General Plan designations. The Penngrove Area Plan Land Use Plan also includes Low-Density Residential and Single-Family Residential Designations, which align closest with the Urban Residential General Plan Land Use Designation. There are no inconsistencies between the Penngrove Area Plan and the General Plan land use designations.

Policies

The Penngrove Area Plan contains policies and recommendations for land use, transportation, public services, hydrology, and open space. It identifies constraints and mitigation measures to address natural hazards and mitigate impacts to the natural, agricultural, cultural, and biological resources in the Plan Area.

The Penngrove Area Plan identifies scenic routes and includes policies for development along scenic routes. These policies are consistent with the General Plan. Where scenic corridor policies are inconsistent between the Penngrove Area Plan and the General Plan, the Penngrove Area Plan states the more restrictive policy shall apply. The Penngrove Area Plan identifies the following roads as scenic routes in the Plan Area, which are consistent with the Scenic Routes shown in General Plan Figure OSRC-1, Scenic Resource Areas:

- Petaluma Hill Road
- Adobe Road
- Old Redwood Highway

The Penngrove Area Plan designates riparian corridors and contains policies for regulating development adjacent to these corridors. Development standards vary slightly from what the General Plan requires, but between the Area Plan and the General Plan, the Penngrove Area Plan states the more restrictive policy would apply.

Design Standards

The Penngrove Area Plan contains Design Standards, which primarily implement the Historic District standards for the area. The Design Standards regulate building design, architecture, and site design. There are no inconsistencies between the Penngrove Area Plan Design Standards and the General Plan.



Petaluma Dairy Belt Area Plan

Adopted 1985, last updated 2008

Purpose

The Petaluma Dairy Belt Area Plan is an Area Plan for the Petaluma Dairy Belt in south and southwestern Sonoma County along the Marin County/Sonoma County boundary. The Petaluma Dairy Belt Area Plan states the following priorities for the plan:

1. The primary priority shall be to preserve and enhance the agricultural resources and protect the agricultural industry found in this study area;
2. Preserve the area's scenic beauty;
3. Accommodate a variety of rural lifestyles;
4. Encourage the development of an adequate transportation network that will accommodate proposed development and projected travel needs, and which will facilitate movement of agricultural products to the marketplace.

Land Use Designations

The Petaluma Dairy Belt Area Plan uses General Plan land use designations in its land use plan. Specifically, it uses the Land Extensive Agriculture, Diverse Agriculture, Rural Residential, General Commercial, Limited Commercial, General Industrial, Limited Industrial General Plan, and Public/Quasi-Public designations. There are no inconsistencies between the PDBAP and General Plan Land Use designations.

Policies

The Petaluma Dairy Belt Area Plan contains policies and recommendations for land use, natural resources, natural hazards, agriculture, public services, biological resources, hydrology, transportation, and scenic resources. It identifies constraints and mitigation measures to address natural hazards and mitigate impacts to the natural, agricultural, cultural, and biological resources in the Plan Area. There are no major inconsistencies between the Petaluma Dairy Belt Area Plan policies and the General Plan.

The Petaluma Dairy Belt Area Plan Open Space Plan includes a section for Scenic Corridors, but neither the plan description nor map appear to identify any specific routes as scenic corridors.



The Petaluma Dairy Belt Area Plan Open Space Plan identifies riparian corridors and includes policies for development setbacks that vary slightly from what the General Plan requires:

- Petaluma Dairy Belt Area Plan riparian corridor requirements:
 1. A 200-foot building setback shall be maintained from the outer edge of the riparian vegetation for all development projects that involve grading or vegetation removal for the riparian corridors designated on the Open Space Plan Map.
 2. A 100-foot building setback shall be maintained from the outer edge of riparian vegetation in riparian corridors of all perennial streams, as defined by the United States Geological Survey (USGS).
 3. Agricultural uses, including cultivation of the land for agricultural use, shall maintain a 30-foot setback from the outer edge of the riparian vegetation.
- General Plan Policy OSRC-8b: Establish streamside conservation areas along both sides of designated Riparian Corridors as follows, measured from the top of the higher bank on each side of the stream as determined by PRMD:
 1. Russian River Riparian Corridor: 200 feet
 2. Flatland Riparian Corridors: 100 feet
 3. Other Riparian Corridors: 50 feet

Where riparian corridor policies are inconsistent between the Petaluma Dairy Belt Area Plan and the General Plan, the Petaluma Dairy Belt Area Plan states that the more restrictive policy shall apply.

Sonoma Developmental Center Specific Plan¹

Adopted 2022

Purpose

The Sonoma Developmental Center Specific Plan covers 945 acres in Sonoma Valley that encompass the site of the former Sonoma Developmental Center, which provided services to persons with developmental disabilities for over 120 years before the State closed the facility in 2018. The Specific Plan Area includes a large historic campus, agricultural lands, and vast

¹ *SCALE v. County of Sonoma*, Case Number CSV-272539 was filed in the Superior Court of the State of California for the County of Sonoma in January 2023 challenging the adoption of the Sonoma Development Center Specific Plan. This litigation was pending at the time this memorandum was drafted.



ecological and open space resources. The Specific Plan includes the following guiding principles:

- Promote a Vibrant, Mixed-Use Community
- Emphasize a Cohesive Sense of Place and Walkability
- Integrate Development with Open Space Conservation
- Balance Redevelopment with Existing Land Uses
- Promote Sustainability and Resiliency
- Support Housing Development and Provide a Variety of Housing Types
- Balance Development with Historic Resource Conservation
- Promote Multi-Modal Mobility
- Ensure Long-Term Fiscal Sustainability
- Embrace Diversity

General Plan 2020 Consistency

As part of the recent process to adopt the Sonoma Developmental Center Specific Plan in 2022, the County evaluated the consistency of the Specific Plan with General Plan 2020 and concluded that, with the General Plan amendments that were adopted at the same time as the Specific Plan, the plans are consistent. In particular, the Specific Plan expands preservation of open space and natural resources, allows for a manageable amount of population and growth with a mix of housing types and affordability, and provides essential amenities to the Sonoma Valley area, consistent with General Plan 2020 guidance. The Plan reaffirms the General Plan's commitment to maintaining growth and development and conserving resources, particularly in Sonoma Valley with its unique characteristics. The consistency review is available in the [September 6, 2022, Board of Supervisors meeting staff report](#).

As noted, General Plan 2020 was amended at the time of adoption of this Specific Plan to retain consistency. The amendments were as follows:

- The following new Policy LU-20mm was added to the Land Use Element: All development located on APN Parcel Number: 054-090-001, 054-150-005, 54-150-010, 054-150-013, 054-080-001 shall conform with policies and programs identified in the Sonoma Developmental Center Specific Plan.
- Figure LU-2i, the Land Use Map for Sonoma Valley, was modified to change the land use designation of the Sonoma Developmental Center site from Public/Quasi Public (P/QP) to Sonoma Developmental Center Specific Plan (SDC) for the Core Campus area. The USB was also expanded to include the Core Campus west of Arnold Drive.



Sonoma Mountain Area Plan

Adopted 1978, last updated 2012

Purpose

The Sonoma Mountain Area Plan is an Area Plan for a 65-square-mile area in the southeasterly quadrant of Sonoma County between Crane Canyon Road and Highway 37. The goals of the Sonoma Mountain Area Plan are to protect agricultural, natural, and scenic resources while guiding development to maintain an agricultural and rural character throughout the area.

Land Use Designations

The Sonoma Mountain Area Plan uses General Plan land use designations in its land use plan. Specifically, it uses the Resources and Rural Development, Land Extensive Agriculture, Diverse Agriculture, Rural Residential, Urban Residential, Recreation and Visitor-Serving Commercial, and Public/Quasi-Public General Plan designations. There are no inconsistencies between the Sonoma Mountain Area Plan and General Plan land use designations.

Policies

The Sonoma Mountain Area Plan contains policies and recommendations for land use, open space, and scenic, biological, and agricultural resources. It identifies constraints and mitigation measures to address natural hazards and mitigate impacts to the natural, agricultural, cultural, and biological resources in the Plan Area. There are no major inconsistencies between the Sonoma Mountain Area Plan policies and the General Plan.

A key concern of the Sonoma Mountain Area Plan is pressure for development and urban services at the eastern limit of the City of Rohnert Park. Three Sonoma Mountain Area Plan policies express this concern:

1. Land use determinations east of Petaluma Hill Road should be consistent with the agricultural characteristics of the area.
2. The Sonoma Local Agency Formation Commission (LAFCO) should not permit special urban service districts beyond the urban boundaries.
3. "Paper subdivisions" adjacent to and near the city should be reviewed and methods explored to prevent inappropriate high-density development.

Although the Sonoma Mountain Area Plan cannot regulate the decision-making authority of Sonoma LAFCO, the intent of these policies to protect the agricultural and undeveloped area east of the city is clear. It is noted here that General Plan Policies PF-1f, PF-1g, and PF-1h



provide criteria for extension of urban service districts, including exceptions to allow extension beyond USBs for public health reasons or to connect farmworker or affordable housing projects along USBs.

The Sonoma Mountain Area Plan Open Space Plan identifies scenic corridors and includes scenic corridor policies. The Sonoma Mountain Area Plan designates the following routes as scenic corridors, which are consistent with the Scenic Routes shown in General Plan Figure OSRC-1, Scenic Resource Areas:

- Petaluma Hill Road
- Adobe Road
- Stage Gulch Road

The Sonoma Mountain Area Plan Open Space Plan also identifies riparian corridors and includes riparian corridor policies. The Sonoma Mountain Area Plan scenic corridor and riparian corridor policies are subjective and do not contain objective standards compared to the General Plan policies. Where scenic corridor and riparian corridor policies are inconsistent between the Sonoma Mountain Area Plan and the General Plan, the Sonoma Mountain Area Plan states that the more restrictive policy shall apply.

South Santa Rosa Area Plan

Adopted 1982, last updated 2008

Purpose

The South Santa Rosa Area Plan is an Area Plan for an 18,000-acre area south of Santa Rosa and north of Rohnert Park in central Sonoma County. The South Santa Rosa Area Plan states the following priorities:

- Revision of the urban boundary
- Accommodation of a variety of rural lifestyles
- Protection and maintenance of agriculture
- Direction of most new housing to locations closest to the community center
- Provision of urban services before or concurrent with urban development

Land Use Designations

The South Santa Rosa Area Plan uses General Plan land use designations in its land use plan. Specifically, it uses the Resources and Rural Development, Land Extensive Agriculture, Diverse Agriculture, Rural Residential, Urban Residential, Limited Commercial, General Commercial, Limited Industrial, General Industrial, and Public/Quasi-Public General Plan



designations. There are no major inconsistencies between the use of these designations in the South Santa Rosa Area Plan and in the General Plan.

The South Santa Rosa Area Plan designates an area of land along Petaluma Hill Road under a special designation called “Urban Reserve.” The South Santa Rosa Area Plan recommends this designation to identify land that should be prioritized for development when urban expansion is needed. The lands to which the South Santa Rosa Area Plan applies the Urban Reserve designation are currently designated Diverse Agriculture under the General Plan.

Policies

The South Santa Rosa Area Plan contains policies and recommendations for land use, housing, agriculture, scenic resources, minerals, biological resources, circulation, open space, historic preservation, and public safety. It identifies constraints and mitigation measures to address hazards and mitigate impacts to the natural resources, traffic, public services, air quality, energy, and cultural resources. There are no major inconsistencies between the South Santa Rosa Area Plan policies and the General Plan.

The South Santa Rosa Area Plan contains specific policies for the Brooks Avenue Area. These policies reference and are consistent with General Plan Policy LU-16h.

The South Santa Rosa Area Plan identifies the Todd Road extension to Highway 116 as a concern that could impact the Laguna de Santa Rosa riparian corridor. The South Santa Rosa Area Plan calls for a study to understand the potential impacts from this extension. The General Plan update could consider this issue.

The South Santa Rosa Area Plan recommends the following roads as scenic routes in the Plan Area, some of which are not shown as a scenic route in General Plan Figure OSRC-1, Scenic Resource Areas, as noted below:

- Urban Scenic Corridors
 - Highway 101
 - Highway 12
 - Farmers Lane (not identified in the General Plan)
 - Petaluma Hill Road
- Rural Scenic Corridors
 - Petaluma Hill Road
 - Llano Road (not identified in the General Plan)
 - Todd Road (not identified in the General Plan)
 - Stony Point Road (not identified in the General Plan)



As part of the General Plan update process, the memorandum recommends considering whether to add the scenic routes from the SSRAP to Figure OSRC-1.

The South Santa Rosa Area Plan designates riparian corridors and contains policies for regulating development adjacent to these corridors. Policies for development along riparian corridors vary slightly from what the General Plan requires:

- South Santa Rosa Area Plan riparian corridor requirements: Setbacks of 200 feet are required on major or perennial streams and 100-foot setbacks are required on minor and ephemeral streams.
- General Plan Policy OSRC-8b: Establish streamside conservation areas along both sides of designated Riparian Corridors as follows, measured from the top of the higher bank on each side of the stream as determined by PRMD:
 1. Russian River Riparian Corridor: 200 feet
 2. Flatland Riparian Corridors: 100 feet
 3. Other Riparian Corridors: 50 feet

Where riparian corridor policies are inconsistent between the South Santa Rosa Area Plan and the General Plan, the South Santa Rosa Area Plan states that the more restrictive policy shall apply.

Development Guidelines

The South Santa Rosa Area Plan contains design guidelines for building design, architecture, and site design for developments in the Plan Area. There are no inconsistencies between the South Santa Rosa Area Plan urban design guidelines and the General Plan.

The South Santa Rosa Area Plan contains specific development standards for each of the following areas:

- U.S. 101 Urban Scenic Highway Corridor Design Guidelines
- Highway 12 Urban Scenic Highway Corridor Design Guidelines
- Santa Rosa Avenue Urban Street Corridor Design Guidelines, including street sections
- Sebastopol Road Urban Corridor Design Guidelines, between Stony Point Road and Dutton Avenue (*obsolete, Roseland community has been annexed by the City of Santa Rosa*)
- Roseland Village Shopping Center (*obsolete, Roseland community has been annexed by the City of Santa Rosa*)



There are no inconsistencies between the SSRAP development guidelines and the General Plan policies. Where SSRAP development guidelines are inconsistent with the General Plan, the SSRAP states that the more restrictive policy shall apply.

West Petaluma Area Plan

Adopted 1981, last updated 2008

Purpose

The West Petaluma Area Plan is an Area Plan for an 11,000-acre area south and east of the City of Petaluma in southwestern Sonoma County. The West Petaluma Area Plan states the following priorities:

- Establish an urban boundary
- Accommodate a variety of rural lifestyles
- Protect and maintain agriculture

Land Use Designations

The West Petaluma Area Plan uses General Plan land use designations to constitute its land use plan. Specifically, it incorporates the Rural Residential, Limited Commercial, Diverse Agriculture, General Commercial, Land Extensive Agriculture, and Public/Quasi-Public General Plan designations. There are no inconsistencies between the use of these designations in the West Petaluma Area Plan and in the General Plan.

Policies

The West Petaluma Area Plan contains policies and recommendations for land use, open space, natural resources, scenic resources, and cultural and historic resources. It identifies constraints and mitigation measures to address hazards and mitigate impacts to natural resources, traffic, public services, air quality, energy, and cultural resources. There are no major inconsistencies between the West Petaluma Area Plan policies and General Plan policies.

The West Petaluma Area Plan land use policies generally aim to prioritize urban development on lands in the USB of the City of Petaluma and limit development outside of the USB. These policies are consistent with General Plan policies, specifically policies under Section LU-3.8, Petaluma and Environs.

The West Petaluma Area Plan identifies scenic corridors and includes policies for development along scenic corridors and viewsheds. The West Petaluma Area Plan identifies the following



scenic routes in the Plan Area, which are consistent with the Scenic Routes shown in General Plan Figure OSRC-1, Scenic Resource Areas:

- Petaluma Boulevard North
- Bodega Avenue
- D Street

West Petaluma Area Plan policies for development along scenic corridors vary slightly compared to General Plan requirements:

- West Petaluma Area Plan scenic corridor requirements:
 - Along scenic routes, a 200-foot building setback (from the centerline of the road) is required to preserve the open rural character of the route. If development is proposed within the setback, an administrative permit procedure is recommended that can authorize exceptions according to design and siting criteria appropriate to rural areas. Where such setback is less restrictive than required for General Plan-designated scenic corridors, compliance with the General Plan standards is required.
 - In the vicinity of viewsheds, a 400-foot building setback is recommended to prevent disturbing or blocking long views from the road. Administrative permits to build within the setback may be approved, as with scenic routes.
- General Plan Policy OSRC-3c: Establish a rural Scenic Corridor setback of 30 percent of the depth of the lot to a maximum of 200 feet from the centerline of the road unless a different setback is provided in the Land Use Policies for the Planning Areas.

Where scenic corridor policies are inconsistent between the West Petaluma Area Plan and the General Plan, the West Petaluma Area Plan states that the more restrictive policy shall apply.

The West Petaluma Area Plan designates riparian corridors and contains policies for regulating development adjacent to these corridors. Policies vary slightly from what the General Plan requires:

- West Petaluma Area Plan riparian corridor policies:
 - Petaluma River is a major riparian corridor subject to the riparian corridor standards and policies of the General Plan.
 - Minor riparian corridors are recommended for all other creeks in the study area. A 100-foot setback is required for minor riparian corridors. Setbacks are critical in affording minimal protection to not only the riparian setting but to archaeological sites, which are frequently distributed near water sources. A setback also affords the retention of agricultural lands where cattle are present.
- General Plan Policy OSRC-8b: Establish streamside conservation areas along both sides of designated Riparian Corridors as follows, measured from the top of the higher bank on each side of the stream as determined by PRMD:



1. Russian River Riparian Corridor: 200 feet
2. Flatland Riparian Corridors: 100 feet
3. Other Riparian Corridors: 50 feet

Where riparian corridor policies are inconsistent between the WPAP and the General Plan, the West Petaluma Area Plan states the more restrictive policy shall apply.

Local Area and Historic District Design Guidelines

Local Area and Historic District Design Guidelines provide guidance and standards to implement General Plan policy guidance to protect and enhance community and historic character. There are six Local Area Design Guidelines and five Historic District Design Guidelines adopted in the county. The consistency review considered the potential for implementation of a General Plan policy to conflict with a goal or requirement of a design guideline, or vice versa. The Historic District Design Guidelines were also audited against General Plan policies for Historic Districts under Goal OSRC-19.

Table 4 provides an overview of the design guidelines and audit findings.

Table 4. Local Area and Historic District Design Guidelines Consistency Overview

Design Guidelines	Audit Overview
Glen Ellen Local Area Design Guidelines	<ul style="list-style-type: none"> ● No inconsistencies with the General Plan.
Highway 12 Design Guidelines	<ul style="list-style-type: none"> ● Potential inconsistencies with General Plan scenic corridor setback requirements along Highway 12.
Highway 116 Scenic Highway Corridor Study	<ul style="list-style-type: none"> ● No inconsistencies with the General Plan.
Russian River Corridor Design Guidelines	<ul style="list-style-type: none"> ● No inconsistencies with the General Plan. ● Design guidelines for properties along the Russian River may interact with General Plan riparian corridor streamside conservation requirements but do not conflict.
Sebastopol Road Urban Vision Plan	<ul style="list-style-type: none"> ● Obsolete with annexation of Roseland community into City of Santa Rosa.
Bodega Historic Design Guidelines	<ul style="list-style-type: none"> ● No inconsistencies with the General Plan.
Duncan Mills Historic District Design Guidelines	<ul style="list-style-type: none"> ● No inconsistencies with the General Plan.



Design Guidelines	Audit Overview
Freestone Historic District Design Guidelines	<ul style="list-style-type: none"> • No inconsistencies with the General Plan.
Occidental Historic District Design Guidelines	<ul style="list-style-type: none"> • No inconsistencies with the General Plan.
Penngrove Main Street Design Guidelines	<ul style="list-style-type: none"> • Potential coordination required between the Design Guidelines recommendations for Main Street streetscape and General Plan safety and traffic improvements.

Local Area Design Guidelines

Glen Ellen Local Area Design Guidelines

Adopted 1990

No inconsistencies with the General Plan were found. Glen Ellen Local Area Design Guidelines refer to Sonoma County General Plan for land use and open space conservation policies. The guidelines focus primarily on building design, architecture, and site design to maintain the character of the community.

Highway 12 Design Guidelines

Adopted 1994

There are potential inconsistencies with the General Plan Scenic Corridor policies (i.e., policies under Goal OSRC-3). Highway 12 is a designated Scenic Corridor in Sonoma County. The Highway 12 Design Guidelines promote potentially smaller setbacks along the Springs Area segment of Highway 12 north of the City of Sonoma, which could conflict with General Plan Policies OSRC-3b and OSRC-3c. These policies mandate minimum setbacks along Scenic Corridors that may be wider than what is allowed by the Highway 12 Design Guidelines.

Highway 116 Scenic Highway Corridor Study

Adopted 1988

No inconsistencies with the General Plan were found. Objective SH1.8 in the Corridor Study states that “If there is a conflict between General Plan policies and policies of the Highway 116 study, the General Plan will prevail.” Also to note is that the scenic corridor setback in General Plan Policy OSRC-3c aligns with Program SH-1.1a of the Corridor Study, which calls for an ordinance requiring these setback dimensions along Highway 116.



Russian River Corridor Design Guidelines

Adopted 2010

No inconsistencies with the General Plan were found. General Plan Policies OSRC-8b, OSRC-8d, and OSRC-8e designate the Russian River as a Riparian Corridor and establish a 200-foot streamside conservation area on both sides of the river with limitations on uses and activities. The Russian River Corridor Design Guidelines guide commercial development and multifamily residential and single-family residential projects of four or more units on properties that may fall within these streamside conservation areas. General Plan Policy OSRC-8e prohibits grading, vegetation removal, structures, roads, and parking lots in streamside conservation areas, with some exceptions. Therefore, the Design Guidelines would not apply in streamside conservation areas, unless an exception to Policy OSRC-8e was made or a project was modifying an existing structure.

Sebastopol Road Urban Vision Plan

Adopted 2007

This document may no longer be relevant. The Plan Area is in Roseland, which was annexed by the City of Santa Rosa in 2017.

Historic Design Guidelines

Bodega Historic District Design Guidelines

Adopted 2010, revised 2012

No inconsistencies with the General Plan were found. The Bodega Historic District Design Guidelines focus primarily on building design, architecture, and site treatment to maintain the historic district. These guidelines do not govern land use nor design of public rights-of-way and are consistent with objectives and policies under General Plan Goal OSRC-19.

Duncans Mills Historic District Design Guidelines

Adopted 2010, revised 2012

No inconsistencies with the General Plan were found. The Duncans Mills Historic District Design Guidelines focus primarily on building design, architecture, and site design to maintain the historic district. These guidelines do not govern land use nor design of public rights-of-way and are consistent with objectives and policies under General Plan Goal OSRC-19.



Freestone Historic District Design Guidelines

Adopted 2010, revised 2012

No inconsistencies with the General Plan were found. The Freestone Historic District Design Guidelines focus primarily on building design, architecture, and site design to maintain the historic district. These guidelines do not govern land use nor design of public rights-of-way and are consistent with objectives and policies under General Plan Goal OSRC-19.

Occidental Historic District Design Guidelines

Adopted 2010, revised 2012

No inconsistencies with the General Plan were found. The Occidental Historic District Design Guidelines focus primarily on building design, architecture, and site design to maintain the historic district. These guidelines do not govern land use nor design of public rights-of-way and are consistent with objectives and policies under General Plan Goal OSRC-19.

Penngrove Main Street Design Guidelines

Adopted 2010

General Plan Circulation and Transit Policies CT-7v, CT-7w, CT-7x, and Implementation Program 9 call for safety and traffic-calming improvements in Penngrove. These do not appear to conflict with the Penngrove Main Street Design Guidelines but may need to be coordinated. In addition to guiding building design, architecture, and site design, the Penngrove Main Street Design Guidelines includes recommended street sections for Main Street, which would be included in the purview of the General Plan policies referenced previously. These guidelines are also consistent with the objectives and policies under General Plan Goal OSRC-19. No inconsistencies with the General Plan were found.