



GENERAL PLAN CONSISTENCY DETERMINATION

To: MTC Public Information, Attn: Draft EIR Comments

From: Eric Gage, Planner III

Date: 20 July 2021

Project Applicant: MTC/ABAG

Project Name: Plan Bay Area DEIR (County PPR21-0004)

Project Location: Countywide

Project Description: The proposed Plan is a long-range regional plan that outlines 35 integrated strategies across four key issues—housing, the economy, transportation, and the environment—to make the Bay Area more equitable for all residents and more resilient in the face of unexpected challenges.

Sonoma County Planning staff have reviewed the Draft EIR and offers the following comments:

The impact analysis should discuss project impacts to unincorporated counties in greater detail. Where environmental impacts are reduced by Plan Strategies, additional discussion of each Strategy should be included in the EIR document.

Greenhouse Gas Regulatory Setting, Pg. 3.6-30. Table 3.6-7 states that Sonoma County has a finalized and adopted Community Climate Action Plan. A Climate Action Plan was adopted in 2017, but was later decertified as the result of a lawsuit and was never implemented. Furthermore, the Climate Action Plan was based on 2020 emissions reduction targets and a horizon year of 2020.

Impact HYDRO-2, Pg. 3.10-30. The discussion of how groundwater supplies would be affected by the project is incomplete without addressing population growth in unincorporated areas where groundwater is the primary water source. The abstract discussion of the SGMA regulatory framework is insufficient without specifically relating it to the impacts of the project. Please expand the analysis to quantitatively address how residential growth will affect availability of well water in rural areas.

Impact LU-3, Pg. 3.11-29. This section does not specifically address anticipated growth in rural and unincorporated areas. At minimum, please elaborate on what the implementation of Plan Strategy EN04, "Maintain Urban Growth Boundaries" entails, and how residential growth in rural and unincorporated areas will be geographically distributed. The text defers the minimization of this impact to local plan development and corresponding environmental review. In this case, please elaborate on the authority of rural Counties to locate new growth in areas of existing infrastructure and services.



Impact TRA-2, Pg. 3.15-27. Although this section states that implementation of the Plan will reduce VMT on average across the Bay Area region, it does not discuss how trip generation will occur in rural counties. Please address how residential growth in geographically dispersed populations of unincorporated counties will contribute to VMT.

County Growth Control Measures, Pg. 3.11-17. This section should also discuss community zoning constraints that limit residential densities in rural areas. Sonoma County has applied a Community Separator zoning district to 53,867 acres of land between urbanized communities. These Community Separator areas were adopted by the voters of Sonoma County and would require the passage of a new ballot measure to modify. The Community Separator zoning district encourages city-centered growth by reducing maximum residential densities in these border areas. These and other local zoning-based growth control measures also need to be addressed in the EIR.

General Plan Consistency Determination: Inconsistent

Discussion

For many years, the County Planning Department has emphasized the importance of city-centered growth through General Plan policy and zoning. Plan Bay Area and the associated RHNA allocation designate substantial residential growth outside of County-designated Urban Service Areas (USA). The USA boundaries delineate the planned extent of sewer and water infrastructure. The Sonoma County General Plan contains numerous policies prohibiting or discouraging the expansion of service infrastructure outside of the USA boundary. This policy position aligns with long-standing LAFCO policy and regulation prohibiting extension of services without annexation into an incorporated city. As noted above, the County has 53,867 acres of land under a Community Separator combining district, a zoning designation intended to focus new growth in urbanized areas by prohibiting high density residential development in areas between urbanized communities. The Community Separators adopted by the voters of Sonoma County, and would require the passage of a ballot measure to modify.

Plan Bay Area should allocate new growth within existing USAs served by water and sewer, and city spheres of influence for future annexation. The EIR should evaluate and quantify the maximum residential capacity of these relatively small geographic areas within rural counties. The impact analysis and housing allocations should be adjusted accordingly.

Applicable General Plan Policies:

AR-2c: Avoid urban level services within the Urban Service Area surrounding the City of Sebastopol prior to annexation except where consistent with the policies of the Public Facilities and Services Element. Development in that area prior to annexation may be served by rural services and shall be designed to permit realization of the urban potential upon annexation.

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.



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LU-3c: Avoid urban sprawl by limiting extension of sewer or water services outside of designated Urban Service Areas pursuant to the policies of the Public Facilities and Services Element.

LU-5a: The County shall neither approve extension of sewer service into any Community Separator nor approve connection of any lot in a Community Separator to existing sewer service except as allowed by the policies of the Public Facilities and Services Element.

LU-5e: 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.

LU-6i: Provide expanded opportunities for a mix of residential and commercial or industrial use in Urban Service Areas.

LU-15c: Avoid new Urban Service Areas or entities, except where necessary to resolve water quality problems resulting from failing septic systems.

LU-16p: 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.

LU-17b: Avoid urban level services within the Urban Service Area surrounding the City of Sebastopol prior to annexation except where consistent with the policies of the Public Facilities and Services Element. Development in that area prior to annexation may be served by rural services and shall be designed to permit realization of the urban potential upon annexation.

OSRC-1j: No lands within a Community Separator should be included in a City's Urban Growth Boundary or Sphere of Influence, in an Urban Service Area for an unincorporated community, or annexed to a city unless the lands are first removed from the Community Separator.

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.

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



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- (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.



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