

CALIFORNIA COASTAL COMMISSION

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County of Sonoma
Planning Department
Attn: Cecily Condon, Gary Helfrich
2550 Ventura Ave.
Santa Rosa, CA 95403

**Subject: County of Sonoma Draft Local Coastal Program Land Use Plan Update:
Cultural Resources Chapter**

Dear Mr. Helfrich:

Thank you for the opportunity to review and comment on the County's proposed update to the Local Coastal Program (LCP) Land Use Plan (LUP). We want to thank the staff involved in this update for their hard work, and for coordinating with us during this process. In our experience, this type of early coordination helps to ensure a smoother LCP certification process, including streamlining review and resolution of issues upon submittal to the Coastal Commission. The comments and recommendations below summarize the overarching feedback on Chapter 10: Cultural Resources.

- 1. Discovery and Monitoring of Sensitive Sites.** Policy C-CH-1d requires studies for development with new ground disturbance, however this chapter lacks policies for monitoring if the study itself identifies archeological or paleontological resources. In addition, there is no policy for if archeological or paleontological resources are encountered during the course of development. We would recommend adding these two policies below in order to ensure protection of these important resources. Sample language is included below from the Certified 2021 Half Moon Bay LCP:

8-10. Archaeological and Paleontological Resources Monitoring. *Require, where a pre-development survey identifies the potential to affect known or newly discovered archaeological, Native American, or paleontological resources, the submittal of a monitoring and reporting plan that identifies methods and describes the procedures for selecting archeological and Native American monitors and procedures that will be followed if additional or unexpected resources are encountered during development of the site. Procedures may include, but are not limited to, provisions for cessation of all grading and construction activities in the area of the discovery that has any potential to uncover or otherwise disturb cultural deposits in the area of the discovery and all construction that may foreclose mitigation options to allow for significance testing, additional investigation and mitigation.*

8-11. Discovery of Archaeological and Paleontological Resources. *Regardless of site location, require all development to halt work if subsurface archaeological or paleontological resources are discovered during construction. The developer shall notify*

the City and retain a qualified professional to identify any necessary handling and notification procedures and mitigation measures. Work shall not resume until these measures have been reviewed and approved by the City and all appropriate entities have been notified. Consult with the appropriate Native American tribe(s) on if and how to rebury any discovered tribal resources

The list above is intended as a complement to the in-line edits and comments provided for the Cultural Resources Element, but is not exhaustive of every comment and edit included. Therefore, edits and comments in the chapter itself should be treated as the primary source of feedback, with this letter serving as guidance containing some of the major themes of our recommendations. We anticipate discussing these issues in more detail during staff-to-staff coordination meetings with Sonoma County staff:

Again, we thank you for your efforts to date on the update to the LUP, and we look forward to continued coordination toward this end.

Sincerely,

Peter Benham

Peter Benham
Coastal Planner
North Central Coast District Office
California Coastal Commission