

## Local Coastal Plan Update Comments Summary

Comment #	Comment Date	Name	Organization	Address	Email	LCP Section	Category	Multiple	Summary
1	7/24/2021	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Agriculture 12.5	Biotic Protections	N	<i>Review and Clairfy Aquaculture Section:</i> Clarify ecosystem impacts (pollution, non-native species introduction, disease between native/non-native species) of aquaculture, limit aquaculture locations, be consistent with state permitting guidelines, and include provisions to reduce env. impact. Re-emphasizing the aquaculture section review. Including a link to the Ocean Protection Council's "Guiding Principles for Sustainable Marine Aquaculture in California" to be used for LCP modifications. Cea Higgins would like the language to be more "comprehensive, science-based, considerate of env. impacts, and consistent w/ state and federal aquaculture policies".
2	7/25/21	Dyer, Dawnine	N/A	37977 Sentinel Close, Unit 21 Lot 149, The Sea Ranch	N/A	Land Use	Vacation Rentals	N	PRO vacation rental restrictions @ The Sea Ranch: review # of days and distance between rental units. There is sufficient nuisance control, but it should be at a neighborhood level rather than county level.
3	7/24/21	Epstein, Deborah	N/A	Sonoma County	N/A	Land Use	Vacation Rentals	N	Against restrictions @ The Sea Ranch. States that a majority of renters are families enjoying the coast, as opposed to party hosts. The Sea Ranch provides families with a nice place to stay while in Sonoma County and brings good tax revenue for SoCo.
4	7/23/21	Grahame, Margaret	N/A	Timber Cove	N/A	Land Use	Housing	Y	Insufficient communication and involvement with the community while drafting LCP. There is not enough meaningful data and some aspects of the plan will not be helpful for the community (see: Policy C-LU5d, pg PF-11, and applications of GP policies). Lack of understanding real issues like Coastal Permit Process for Fire Abatement and Employee Housing. Basing business knowledge on 1980s data rather than community. Policy C-LU-6h through C-LU-6n need to be revisited with more community input. Public access points need to be discussed with private landowners. Finds 100 ft minimum setback with the addition of expert analysis could determine vacant parcels as undevelopable. Lists some data/word errors found in Table C-LU-1, inconsistent policies Page OSRC-4, and Table C-PF-1 does not make sense.
5	7/25/21	Hansell, Mary	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Bought a property June 1, 2021 with intention of short term renting as means of financial income. Opposed to the restrictions.
6	7/25/21	Hoffman, Bryce	104 Anchorage Close	The Sea Ranch		Land Use	Vacation Rentals	N	Pro restrctions due to heavy traffic in and out of rental homes in their neighborhood. Expressed concern related to homeowners voting in favor of themselves while not even living in the neighborhood to experience the noise and disruption.
7	7/24/21	Moorad, Caroline/Jacquelyn		The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Anti restrictions due to loss of diversity within the community that is brought forth by short term rentals.
8	7/24/21	Kazi, Shaheen	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Used to short term rent until they bought their own property. They fixed up their property for renting purposes and are dismayed that the restrictions will hurt all parties involved (renters, rentees, economy, overall community). Believes that everyone (specifically those who can't afford to buy their own home) should have access to the Sonoma Coast.
9	7/26/21	Krupnick, Wendy	Community Alliance with Family Farmers		N/A	Land Use	Agriculture	N	Draft negates value of production on smaller parcels. Policy C-AR-5c needs to address availibility of long term water supply. Policy C-AR-6a needs to be monitored to assure homes are occupied by farmers.
10	7/25/21	Nakazawa, Glenn	N/A	35011 Crows Nest Drive	N/A	Land Use	Vacation Rentals	N	Owens a home at TSR, has been renting out home since the 90s. Opposes restrictions but agrees with TSRHC in regards to performance standards and tax revenue. County of Sonoma should not restrict short term rentals.
11	7/25/21	O'Neil, Tom	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Feel that the voices of The Sea Ranch were not heard and that the process is being rushed. Restrictions will harm income for renters and negatviely impact the local economy.
12	7/25/21	Rhett, Don	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Support The Sea Ranch Hosting Coalition views, oppose TSRA "Model Rule 6.7".
13	7/25/21	Ross, David	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Support The Sea Ranch Coalition Statement. Enjoyed their short term rental experience over the last 20 years, and now own a home. They do not rent right now, but may wish to do so when they are older for financial reasons.

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14	7/24/21	Saiz, Francisco	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Own and rent out a The Sea Ranch home, are against restrictions. They believe that it will limit access to the coast for travelers/people who need to get away
15	7/25/21	Spain, Kyle	N/A	37067 Schooner Drive	N/A	Land Use	Vacation Rentals	N	Opposed to restrictions. Believes that the restrictions are being put into place with no prior studies or consultations, and that ultimately, restrictions will create more problems than they will solve.
16	7/25/21	Staten, Eric	N/A	176 Sounding	N/A	Land Use	Vacation Rentals	N	Opposed to restrictions. He is unhappy and feels that the way in which the restrictions are trying to be implemented is backhanded and requires more community input. He and his husband rely on rental income, and have not recieved any complaints from neighbors.
17	7/25/21	Styne, Dennis	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	STR helped them enjoy the coast while dealing with financial hardship and now that they own a cabin there, they want to be able to provide the same experience to people who were in their situation.
18	7/25/21	Teismann, Lynne	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Feels that there hasn't been enough data collected prior to coming up with restrictions and that further data needs to be collected to get a more well rounded community opinion.
19	7/26/21	The Sea Ranch Hosting Coalition	The Sea Ranch Hosting Coalition	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Supports reasonable performance standards but is against restrictions on whether and when an owner can rent their property. Feels that not enough data was collected and that these restrictions are an exaggerated response to a small problem.
20	7/25/21	Walden, Amantha	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	County should not be in charge of short term rental performance standards or restrictions. Opposes restrictions.
21	7/24/21	Weiss, Eugene	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Opposes restrictions. Feels as though the restrictions were proposed without valid community input and that more time should be allowed.
22	7/25/21	Zetzer, Susan	N/A	63 Clippers Reach	N/A	Land Use	Vacation Rentals	N	In support of reasonable performance standards and public access. OPPOSED to the new restrictions.
23 INPUT ERROR									
24	7/17/21	Allebach, Fred	N/A	N/A	N/A	Public Access	Public Access	N	Policy C-PA-3g: Low camping costs should be more accessible-- too many reservations made in advance and people can't do same day camping. Policy C-PA-4d: No fees for parking/coastal access.
25	7/18/21	Allebach, Fred	N/A	N/A	N/A	Public Access	Public Access	N	Free parking, lowered camping cost, bus access to coastal destination. Limit vehicles on beach except for emergencies. Free fire evacuation camping areas. No drones, more wildlife protection, take out pampas grass, guard rail on road to Bodega Head, Improve Gualala campground signs
26	7/16/21	Burr, Kimberly	N/A	N/A	N/A	Open Space and Resource Conservation	Biotic Protections	N	ESHA designations are too limited and smal for the habitat needs of plants and animal species.
27	6/23/21	Pettis, Kelsey	N/A	N/A	N/A	Transportation	Transporation	N	Wants to know if there will be a separate vulnerability assessment completed for Bodega Bay in relation to the SR 1 North Transportation Concept Report.
28	7/2/21	N/A	Sonoma County Coalition of Hosts	N/A	N/A	Land Use	Vacation Rentals	N	Small number of places to stay along the coast, and VR (specifically mom & pop) provides more space as well as positively impacts the local economy while also keeping themselves in a financially stable situation. Expresses concern for those who need to rent their homes out to make ends meet.
29	7/19/21	Coletto, Lance	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Please allow people to rent out their homes to folks who otherwise cannot afford to live there.
30	7/19/21	Greenhalgh, Pamela	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	County should not enforce TSRA's Rule 6.7. Not based on the community members and adequate data and studies are not present.

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31	7/16/21	Ho, Eileen	The Sea Ranch Hosting Coalition	36804 Green Cove dr., The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Feels that a majority of the restriction reasons are invalid and therefore, restrictions are pointless; TSRA is not a residential community(most properties are second homes), won't impact affordable housing stock due to the expense of owning the properties, etc.
32	6/25/21	Hughes, Nolan	N/A		N/A	Land Use	Access	N	H-27 trailhead symbol (SCSP: Willow Creek Coleman Valley Access) is on the wrong spot on the map. Should be a mile south west at the next corner of the Park property where Coleman Valley Rd intersects the Park land briefly.
33	7/18/21	Hutchinson, Robert	N/A	Boulder, Colorado	N/A	Land Use	Vacation Rentals	N	In favor of new rules by TSRA. Finds the complaints shallow and not understanding of full time residents.
34	6/23/21	Navarro, Keith	N/A		N/A	N/A	Misc.	N	"Why is there tracking on the link to the draft plan? There is no reason I should be tracked to see a government plan."
35	7/17/21	Kesterson, Jonathan	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Not enough info used for the TSRA's rules. There is no justification for taking a homeowner's right to rent away. STR's are a huge contribution to the local economy. This will not help affordable housing efforts because the houses are way too expensive for people anyway.
36	7/19/21	Lucero, Susann	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	"As a renter in The Sea Ranch once a year since it was built..... you would be taking away the privilege of enjoying they offer and maintain with excellence. Rentals on the California coast ....and the coast should be open to the public !!! What gives you the right to take that happiness away from human beings ???--"
37	7/22/21	Mark	N/A		N/A	N/A	Map Edit	N	Fire department map: label colors for Bodega Bay and Bodega are reversed
38	7/18/21	Newacheck, Paul	N/A	293 Grey Whale, The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Supports limits listed in Model Rule 6.7. Prevents proliferation of rental properties and consistent w/ CA Coastal Zone Commission.
39	7/17/21	Norman, Derek	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Against retrictions, feels they are not the correct response. Derek has never had issues with a renter before and a majority of people who rent enjoy the quiet energy of TSR. States that the minority of TSR (full time residents) are abusing their power and that it's not fair.
40	7/20/21	Alexander, Kathleen	N/A	182 Sounding The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Restrictions are to appease a small group of people, and is not fair. Limiting coastal access for people, and Kathleen is worried that limitations for parking lots and public access trails are next.
41	6/1/21	Liz Martin	BBFPD	Bodega Bay	N/A	Public Safety	Fire Hazards	N	There needs to be reevaluation and update of public safety reponse capacity; The District is underfunded and understaffed and needs better safety needs analysis.
42	10/7/21	N/A	BBPUD	Bodega Bay	N/A	Water Services	Revision	N	Revisions: The Bodega Bay District's 2007 Master Water Plan proposed with two new wells and the total capacity of the current water storage facilities is sufficient for build-out. The proposed two new wells were constructed, one at the Roppolo wellfield in 2008 and the Bay Flat well in 2018

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43	10/1/21	Kaun, Megan	Sonoma Safe Ag Safe Schools	N/A	N/A	Biotic Protections	Pesticides	N	Coastal Commission can regulate pesticides with LCP's. Wants to ban pesticide use in Sonoma County. A suggestion for language in the updated LCP could be: The use of synthetic pesticides, including insecticides, herbicides, fungicides, and lethal rodenticides or any toxic chemical substance that has the potential to significantly degrade biological resources in the Sonoma County Coastal Zone shall be prohibited, except where necessary to address invasive plant species. The eradication of invasive plant species shall consider first the use of non-chemical methods for prevention and management such as physical, mechanical, cultural, and biological controls. Herbicide application shall be restricted to the least toxic product and method, and to the maximum extent feasible, shall be biodegradable, derived from natural sources, and used for a limited time in order to minimize adverse impacts to wildlife and the potential for introduction of herbicide into the aquatic environment or onto adjacent non-targeted vegetation. Application of herbicides shall not take place during the winter season or when rain is predicted within one (1) week of application. In no instance shall herbicide application occur if wind speeds onsite are greater than five miles per hour.
44-01	9/30/21	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	LCP Revision: 3.2.2, C-LU4c, C-LU-5d, C-LU-1	Y	Section 3.2.2 Insert intro and history of BHHA; traffic congestion now occurs year-round especially during nice weather, holidays, and weekends; bypass plan is no longer in the Caltrans plan; please correct all references to the proper BHHA; add: any new development must consider existing water needs of BHHA prior to granting new permits; add Due to our stipulated judgment only single family units are allowed so this cannot be applied to BHHA; Assume this is referring to BHHA. Please change to: Homes in BHHA is a mixture of full time residents, part time residents. and short and long term rentals; Add : BHHA expects that any decisions pertaining to vacation rental or accessory and junior dwelling units be discussed and approved by BHHA to assure compliance with the current stipulated judgement that BHHA operates under. BHHA has established Community Rules to address our standards that apply to both owners and renters.
44-02	9/30/21	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	LCP Revision: 3.6 Aquaculture	Y	BHHA recommends an additional clause in the policy C-AR-7b which calls for a specific review mechanism to assess potential impact of any new Aquaculture Facility on surrounding residential neighborhoods. Proposed: C-AR-7b(6): The establishment of a aquaculture processing facility shall take into account input from local residents and homeowner associations in a transparent process.
44-03	9/30/21	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Open Space & Resource	LCP Revision: Open Space & Resource Conservation2.5.1; Policy C-OSCR-10(a) GP 2020	Y	Update to reflect current use of exterior wood stains/paints in a limited pre-approved color palette or fiber-cement siding in similar colors;; Although it is clear that significant addition "process" would be required before new mining permits are granted to Cheny Gulch, it still seems appropriate to comment along the following lines: Review of any permit applications for mining in Cheny Gulch should take into account noise, traffic, and environmental pollution impacts to nearby residential areas as well as possible infringement of a conservation easement held by the County in this area and other coastal values

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44-04	9/30/21	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Access	LCP Revision: Public Access; 1.1, 1.2, 2.1, 2.1.2, 3.1.1, C-PA-1e, C-PA-1j, Goal C-PA-2, Policies C-PA-2a/2d	Y	Add relationship to the "Public Safety Element"; Consider updated data sources; sp. BHHA; manage the use of public prescriptive rights in accordance with public safety, disaster response, and emergency response capabilities; feasible measures need to take into consideration public safety, disaster preparedness, and emergency response capacities; C-PA-2.9: assess needs for disaster preparedness to geological, fire, or medical emergencies and provide adequate resources; add route trail segments that are adjacent to residential areas so as to minimize residential conflicts and visual intrusions; route trails to avoid hazard zones; parking should not cause residential conflicts;
44-05	9/30/21	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Water	LCP Revision: Water	Y	The requirements are generally sensible in terms of preventing run-off, managing potential pollution. Developers will have to assure no substantive change in run-off even during the development phases for a new home. To facilitate permitting and the necessary studies, BHHA requests that for Permit Sonoma to establish web resources for BMPs and to facilitate identification of qualified organizations for conduct of studies. This could be a new Policy C-WR-10
44-06	9/30/21	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	LCP Revision: Public Safety 1.2, 3.2.4, Policy C-PS-5a, C-PS-6	Y	add policy that develops disaster response options in case large and heavily populated/visited locations become landlocked due to unpassable roadways, such as establishing sea side disaster response. Encourage grazing/ranching as a form of fuel control; add an initiative that focuses on adequate general disaster preparedness.
44-07	9/30/21	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Transit	LCP Revision: Circulation & Transit: Policy C-CT-4k	Y	Include the S. and North Harbour Intersections as list of intersections labeled as needing improvement.
44-08	9/30/21	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	LCP Revision: Public Facilities and Services: 3.1.1, 3.2, 4, 6.1, 6.2, 7	Y	Updated policy for water and sewer needs of any new development should be based on more current data and science. Additional law enforcement is needed for Bodega Harbour to enforce parking restrictions. Effective fire prevention needs to be implemented, mandated medical clinic should be established in Bodega Bay the increased need of emergency services due to the impact of burgeoning tourism.
44-09	9/30/21	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	LCP Revision: Noise: 4.2 C-NE-1	Y	Board should express strong support for this initiative, as loud motorcycles or other vehicles without adequate noise control are a significant source of noise pollution
45	8/25/21	Alexich, Jennie	BHHA	Bodega Bay	N/A	Land Use	LCP Revision	N	Expresses gratitude for continued involvement of BHHA in the drafting of the LCP. Feels that some particularly important aspects related to the specific history of BHHA have not been addressed in the LCP draft.
46-01	N/A	Attachment	Bodega Bay Policy Comments	Bodega Bay	N/A	Transit	Transportation	Y	3.2 Policies listed for Bodega Bay are not compatible with the true needs for BB. Really bad traffic along State Hwy 1.
46-02	N/A	Attachment	Bodega Bay Policy Comments	Bodega Bay	N/A	Land Use	Vacation Rentals	Y	Biggest issue facing Bodega Bay is the proliferation of the vacation rental industry, fueled by the County's want and need for tax and permitting money generated in the area. Harbor View Development-- county is allowing 70 houses to be used for vacation rentals.
47	7/26/21	Browne, Niall	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Opposed to Model Rule 6.7
48	9/24/21	Charter, Richard	N/A	Sonoma Coast	waterway@monitor.net	Biotic Protections	Offshore Wind	N	Shell and BP want a lease to develop an offshore wind energy farm off the Central Coast
49 INPUT ERROR									
50	7/22/21	Cole, Megan	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Opposes Model Rule 6.7 due to lack of adequate data and studies done by TSRA.
51	9/20/21	Culcasi, Cindy	N/A	22087 Gordon Ct, Jenner	N/A	Public Safety	Fire Safety/Management	N	Wants an exception made for residents in regards to obtaining a coastal permit while performing fire abatement/fuel management. It is very expensive for something that is extremely important.

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52	7/23/21	Dick, John	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Opposes Model Rule 6.7 due to lack of adequate data and studies done by TSRA in regards to last minute inputs. Sees restrictions as a huge violation of personal property rights.
53	7/26/21	Eggen, Cindy	N/A	Bodega Bay	N/A	Public Access	Trails	N	Inquiring about how the new plan and trail will affect the equestrian Bodega Bay dune trail and parking lot. Please preserve this trail and also separate bicycles separate for the safety of horses and riders.
54	7/21/21	Cadwell, Cari	N/A	150 White Fir Wood, The Sea Ranch	N/A	Land Use	Vacation Rentals	N	TSRA is enforcing segregated housing with these restrictions. "The Sea Ranch Association is not acting appropriately. This puts the homeowner at risk once the home owners allotted rental days have been met. Being a The Sea Ranch home owner I am not going to refuse any group of people from renting my home just because a Association has declared that I have used up my allotted rental days for the year. This is asking the home owner to discriminate denying equal access to housing or available units. "
55	7/30/21	Fenton, Kate	N/A	Jenner, CA 95459	kafenton@sonic.net	Water	Public Water Systems	N	"Bridgehaven Trailer Park Water System is Residential use, not Recreation. "
56	7/19/21	FitzGerald, Cathy	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Issues at The Sea Ranch can be addressed individually. A blanket approach is divisive and unnecessary.
57	7/26/21	Fraser, Eric	Truth in Tourism	The Sea Ranch	truthintourism@gmail.com	Land Use	Vacation Rentals	N	Public outreach should be more robust. Lower RR should be considered an extension of protections for visitors. There is a bias against STRs by using false information. Performance standards should apply to ALL properties. More regulation means more empty homes which defeats the purpose of restrictions to leave room for worker/affordable housing. Misrepresents housing stock on the coast (and inland). Won't release information to the public regarding how STR's provided resources for members of the public during the fires.
58	8/17/21	Grahame, Margaret	Timber Cove Resort/Coast Kitchen	21780 Highway 1, Jenner	N/A	Water Services	Pipeline Provision	N	Requests a Pipeline Provision Recommendation by Permit Sonoma staff be included in the Local Coastal Plan update currently in process.
59	7/20/21	Harbaugh, Leslie	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	She and her family rely on the income from their rental home in order to maintain upkeep, taxes, association fees. Common sense standards are fine but these restrictions are too much.
60-01	7/22/21	Haring, Kristen	N/A	The Sea Ranch	N/A	Biotic Protections	LCP Revisions: Policy C-OSRC-5b(1)	Y	" (regarding environmentally sensitive habitat) states in subpart (4) that "[a]reas that contribute to the viability of plant and animal species for which there is compelling evidence of rarity" are considered environmentally sensitive habitats. "Compelling evidence of rarity" is an uncertain, purely subjective standard that provides no guidance. It undermines the clear standards established in the policy's first three subparts, and will spawn disputes regarding whether there is sufficient evidence of rarity."

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60-02	7/22/21	Haring, Kristen	N/A	The Sea Ranch	N/A	Biotic Protections	LCP Revisions: Policy C-OSRC-5e(3)	Y	" (regarding marine habitats) states that "[p]ublic access to offshore rocks and onshore nesting/rookery areas used by seabirds to breed or nest or which provide habitat for seals and sea lions shall be prohibited." By addressing bird-nesting and seal-rookery areas with a single slashed phrase, the policy could be misconstrued to prohibit access to all areas that "provide habitat for seals." That would result in a prohibition of access along the entire Sonoma County coast. A clearer statement should be made by using separate clauses, such as: "Public access shall be prohibited to offshore rocks and onshore areas while seals and sea lions are using them as rookeries, and to offshore rocks and onshore areas while seabirds are using them to breed or nest."
60-03	7/22/21	Haring, Kristen	N/A	The Sea Ranch	N/A	Biotic Protections	LCP Revisions: Policy C-OSCR-5e(5)	Y	Similarly, Policy C-OSCR-5e(5) (regarding marine habitats) states that "[d]isturbance of marine mammal haul-out grounds shall be prohibited and recreational activities near these areas shall be limited to passive recreation [and] [d]isturbance of areas used by harbor seals and sea lions shall be avoided." This provision is overbroad and, again, contradicts the LCP's public-access goals. By failing to define "disturbance" and "passive recreation," the provision could be misconstrued to mean that human activity near a haul-out ground is prohibited.
60-04	7/22/21	Haring, Kristen	N/A	The Sea Ranch	N/A	Biotic Protections	LCP Revisions: Policy C-OSCR-5e(6)	Y	(regarding marine habitats) encourages the California Department of Fish and Wildlife to monitor marine mammal haul-out grounds annually "to determine their condition and level of use by marine mammals" and "to incorporate this information into its management plan for marine mammals." These provisions should acknowledge that there are numerous suitable haul-out grounds that marine mammals can and do use, and the number of such grounds in an area reduces the need to prohibit human activity on the relatively few accessible beaches.

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61	7/28/21	Hichwa, Diane	N/A		dhichwa@earthlink.net	OSRC	ESHA Maps Corrections	N	<p>Black point is where Bihler point is. Use of SR for seabird rookery and SN for seabird nesting. Map subarea 1 Gualala Pt island is an SR with 2000 birds. C-OSRC-5e(3) refers to protected area for seals and sea lions but does not have locations on map. Map subarea 1 very S end is missing important marine mammal haul out and large pupping area. Map subarea 5 at Ft Ross has a rock that is a consistent haul out for steller sea lions. Map subarea 6 near Jenner is missing haul out and pupping area for Harbor Seals at the mouth of the river. There is another haul out to the north of russian gulch. Map subarea 9 Bodega Rock has SN but should include Marine Mammals with Harbor Seals, Steller Sea Lions and CA Sea lions PLUS it is SR a rookery for BRAC and now COMU. No map is showing ESHA for Snowy Plover (Doran Beach and Salmon Creek Beach) a listed and protected species. The Globally Important Bird Area of Bodega Bay should have protection of the mudflats and feeding areas for these birds. This area is also a crab nursery.</p> <p>And on the coast I believe there is no place for wind energy with its disturbance to marine mammal migratory routes and an extensive land grid would be needed to support and distribute the power.</p>
62	7/26/21	Jacobs, Joseph	N/A	36549 Sculpture Point The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Believes that Model Rule 6.7 is unfair. Asks that the LCP does not endorse the TSRA rules.
63	7/26/21	Kenber, Chris	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Supports performance standards but opposes caps, number of days rented, and distancing. Majority of homes are 2nd homes. Number of STR has been the same for 15 years. Provides economic value for the community.



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64	7/21/21	N/A	North Bay Association of Realtors	Sonoma Coast	N/A	Land Use	Housing	N	Regulations that would prohibit a property owner from armoring their home or business to provide protection from rising seas and storm waves raises serious concerns pertaining to a regulatory taking without just compensation, and any such regulations must comport with the following Constitutional principles and the Coastal Act itself. MANAGED/PLANNED RETREAT is a commonsense land use practice where practical, especially in rural areas where existing structures can be relocated further inland when they are demolished and rebuilt, so that they will never need a shoreline protection device. This should be implemented where practical, however on some parcels, especially where there is not a deep enough area to relocate the development, managed retreat is not practical, and property owners must be allowed to defend their property from wave attack. These coastal communities are critical to CA both economically and culturally, and they should not be surrendered to the sea, as long as there is a viable method to protect them. Mandatory Rolling Setbacks should be replaced with Tiered Response. Oppose requirement of a deed restriction of property and the waiver of rights as defined in Appendix F (6). Placing deed restrictions on properties or requiring a waiver of rights directly impacts property value and could be considered a Taking requiring just compensation. Allow for maintenance and repair of shoreline protection devices. Oppose sections of the public safety element. We encourage the creation of an evidence-based program where small/individual owners that seek to rent their property can continue to fortify their income while complying with countywide standards, TOT requirements.
65	7/21/21	Lown, Anne	Department of Social and Behavioral Sciences	The Sea Ranch	anne.lown@ucsf.edu	Land Use	Vacation Rentals	N	Very opposed to the restrictions. A very big fan of the diverse groups of renters who come around to experience the coast. Not enough input from community before drafting the rules.
66	7/26/21	Mabry, Cathy	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Opposes TSRA rules, feels that they are unfair towards all parties involved. Feels that the restrictions are without sound basis.
67	7/21/21	McMaster, William		Jenner	N/A	Land Use	Parcel Questions	N	Believes the information in the LCP draft may not be correct and would like to offer some corrections. Parcel 109-050-012 public access plan regarding Ocean Cove is not correct. It has camping and cabins. Parcel 109-210-005 Looked like the zoning was to be changed and wants confirmation that this will not happen in writing. Parcels 109-050-010 and 109-050-030 are tourist commercial, why being changed to village commercial and how does that impact them. Parcel 109-190-007, their homes are the oldest in Timber Cove and they want to be included in the rural communities boundary. Policy C-PA-1d; community needs to know details if public trails around private homes will happen. Overall, feels very in the dark regarding the LCP draft.
68	7/26/21	Smit, Wendy	California Native Plant Society (Milo Baker)	Sonoma Coast	N/A	Biotic Protections	Native Plant Protection	N	Suggestions: acreages of vegetative communities be estimated based on aerial analysis and added to the document. Figures C-OSRC-2a through 2k should be updated every 5 years to reflect documented occurrences or changes in such habitats. Policy C0OSRC-5b (2):: to fully determine if such species are present or absent, multi-year surveys must be conducted per proposed budget. Coastal terrace prairie is a sensitive natural community and should be preserved at all locations.

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69	7/20/21	Mack, MJ	N/A	Sonoma Coast	N/A	Land Use	Vacation Rentals	N	Disabled senior citizen who does rely on the income source and also enjoys the community as it is with renters coming in.
70	9/27/21	Morgan, Laura	N/A	Sonoma Coast	N/A	Biotic Protections	Maps	N	<a href="https://www.bayarealands.org/maps-data/#maps">https://www.bayarealands.org/maps-data/#maps</a> This link is "Stream Conservation Targets and Connectivity" It shows habitat corridors. Worth considering.
71-1	7/26/21	Poehlmann, Chris	N/A	Annapolis, CA	chrispoehlmann@gmail.com	OSRC	C-OSRC-7 Fire Resiliency Plan	N	Mandated shaded fuel break silvicultural prescriptions in Timber Harvest Plans along county roads. Continue to protect view corridors and county roads. Prescription burns can happen all the way up to the road's edge and creates visual blight.
71-2	7/27/21	Poehlmann, Chris	N/A	Annapolis, CA	chrispoehlmann@gmail.com	OSRC	C-OSRC-7 Fire Resiliency Plan	Y	I would also like to request another public meeting scheduled so that the community has the proper time and resources to comment fully on this effort.
71-3	7/27/21	Poehlmann, Chris	Attachment	Annapolis, CA	chrispoehlmann@gmail.com	OSRC	C-OSRC-7 Fire Resiliency Plan	Y	Attachment regarding prescribed burns
72	7/20/21	Merchant, Jennifer	This is a repeat found on line 86-86-7						
73	7/21/21	Alexander, Kathleen	N/A	182 Sounding, The Sea Ranch	182sounding@gmail.com	Land Use	Vacation Rentals	N	No issues with renters in the past, nor have their been issues with other people renting. Covid brought more people to the community which was nice. The rules are overkill to appease a small group of people. Too many limitations for no reason.
74	7/20/21	Quatman, Teri	N/A	39034 Hedgegate Rd. The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Against the new restrictions but feels that there should be specific complaints like noise and littering that get addressed individually rather than shutting down the whole rental activity.
75	7/20/21	Snidle, James	N/A	Mariners Dr, The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Opposed to restrictions. No complaints from full time residents about the other couple that is there the other 6 months of the year. Depends on the rental income.
76	7/22/21	Sakhuja, Sanjay	N/A	20 South Linden Ave S. SF	N/A	Land Use	Vacation Rentals	N	Owned the home for 30 years and it is his primary source of income. Feels that the restrictions will take away his income.
77	7/22/21	Shere, Sarah Hoople	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Very against restrictions-- see no negatives thus far with short term rentals.
78	7/19/21	Spain, Kyle	N/A	37067 Schooner Dr, The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Opposed to restrictions. Not enough data collected or studies conducted to support or back up these restrictions.
79	7/21/21	Thorsen, Lars	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Economic impact assessment should be conducted due to tourism being a huge contributor to the local economy. Major economic damage to family if restrictions are enforced.
80	7/20/21	Ward, Greg	N/A	36574 Sculpture Point Dr, The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Majority of homes are rentals, and the restrictions about distance don't even make sense. Many issues and problems being addressed apply to permanent residents too.
81	7/23/21	White, Molly	N/A	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Opposes Model Rule 6.7. It is not fair that the opinions of a small group in The Sea Ranch should get to impose these rules on everyone else.

Comment #	Comment Date	Name	Organization	Address	Email	LCP Section	Category	Multiple	Summary
82-1	7/21/21	Neary, James; McEnhill, Don; Majorana, Ariel	N/A	Russian River	N/A	Water Resources	Russian River	Y	Policy C-WR-1a: Policy should be applicable to impaired and pristine waters alike throughout the zone. Policy C-WR-1b(4): There should be consideration for hillside projects outside of this 200 foot zone, especially when runoff goes directly to waterways below. A project's location on a hillside above a waterway will result in runoff and negative impacts to the water quality below them. As runoff cuts drainage gullies/channels through the hillside the impacts to the waterways below will only increase through erosion and the amount of water carrying sediment that makes it down the hill. <i>Policy C-WR-1b(4):</i> It needs to be made clear whether "feasible" includes consideration of economic cost or not. We highly suggest that it does not allow consideration of economic cost. If cost is so high to mitigate a project sufficiently, then the project needs to either be changed, cancelled, or moved to a different location. This is true for use of "feasible" throughout the water resources element. <i>Policy C-WR-11:</i> This policy must also require some demonstration that actions are shown to be effective for that particular site location—that the action will do what it says it will do. This policy also needs expanded to require that there will be no new non-point source pollutants entering the waterways due to use of sufficient BMPs. <i>Policy C-WR-2d:</i> "Encourage" should be changed to "require." Without necessary data from all water suppliers and groundwater wells, Sonoma County is tying its own hands and preventing informed decision-making that will benefit all of Sonoma County. <i>Policy CWR-4g:</i> Encourage property owners to incorporate only native, drought tolerant, and low water use plants to conserve water and reduce the potential for runoff and erosion.
82-2	7/21/21	Neary, James; McEnhill, Don; Majorana, Ariel		Russian River	N/A	Circulation and Transit	Russian River	Y	The effects of climate change will continue to make the coastline less accessible than it is now. Possible improvements to access points would be repairing infrastructure, natural erosion and flooding controls should be implemented instead of hard barriers. Finally, available public transit is inaccessible to anyone outside of The Sea Ranch, Point Arena, and Gualala city limits since the MTA (only public transit to Santa Rosa) picks up in town, and it does not have any routes through nearby rural areas despite a significant portion of Sonoma County's population residing in these areas.
82-3	7/21/21	Neary, James; McEnhill, Don; Majorana, Ariel		Russian River	N/A	Cultural and Historical Resources	Russian River	Y	When consulting on areas of cultural and historical significance in Sonoma County and for related resources, it is important that local tribes are included. This means through all stages, from beginning to end, and this is especially true for lands and resources that historically belonged to local tribes.
82-4	7/21/21	Neary, James; McEnhill, Don; Majorana, Ariel		Russian River	N/A	Public Access	Russian River	Y	Sonoma County should focus on limiting this privatization and encouraging the use of public easements to protect these public access points. Along with the need for easily accessible public access points is a need to keep our public trust resources clean and in their natural state. Policy C-PA-3o helps provide for some of this, but is limited to only the "major" facilities. There is also little detail on the monitoring and oversight of these facilities. To truly protect our resources there has to be sufficient trash receptacles and waste facilities to last a tourism-packed weekend, as well as staff to help empty and maintain those facilities.

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83	9/14/21	Neale, Bob	Sonoma Land Trust	Estero Americano	bob@sonomalandtrust.org	Public Access	Map Correction	N	Addresses/apologizes for the decision to not request removal of the K2 point from the draft LCP. Emphasizes role in this process-- as a private land owner.
84	7/26/21	Trombley, Laura	N/A	The Sea Ranch		Land Use	Vacation Rentals	N	Asks for the LCP to reject TSRA restrictions. There are already very many restrictions with The Sea Ranch properties and it is only for the minority's benefit which is elitist.
85-REPEAT	7/23/21	White, Molly	N/A	The Sea Ranch		Land Use	Vacation Rentals	N	Owners of a The Sea Ranch vacation rental and would not like the rules to be implemented. She and her husband support performance standards and common sense rules, but feel that the TSRA Model Rule 6.7 is too restrictive and financially devastating.
86-1	7/22/21	Merchant, Jennifer	The Sea Ranch Association	The Sea Ranch	N/A	OSRC	Land Use	Y	OSRC 5B10 pg 21 and C-LU-4 pg 27: TSRA suggests that they and the other stakeholders should be engaged in developing the implementation plan to ensure it is streamlined in a way that does not increase due diligence costs and clarifies TSRA and County roles and responsibilities. C-LU-4: TSRA requests that PRMD staff work with association staff and stakeholders in the development of this document. LCP should include a timeline for implementation.
86-2	7/22/21	Merchant, Jennifer	The Sea Ranch Association	The Sea Ranch	N/A	OSRC	Land Use	Y	LU-5: Grammar. LU-10: TSRA is unclear on where the County intends to apply land use designations in relation to designated open spaces. Thousands of acres on TSRA commons are designated as open space, some are for use of private recreation and should not be required to be set aside as open space.
86-3	7/22/21	Merchant, Jennifer	The Sea Ranch Association	The Sea Ranch	N/A	OSRC	Land Use	Y	LU-22 Policy C-LU-6f: TSRA requests clarification on whether flight path restrictions do or do not apply adjacent to its air strip and that the specific sites being considered for overnight lodging be more specifically identified.
86-4	7/22/21	Merchant, Jennifer	The Sea Ranch Association	The Sea Ranch	N/A	OSRC	Land Use	Y	LU-26 Policy C-LU-2i: Unclear how urban service boundaries apply to the fixed boundaries of The Sea Ranch.
86-5	7/22/21	Merchant, Jennifer	The Sea Ranch Association	The Sea Ranch	N/A	OSRC	Land Use: Housing	Y	LU3-4: TSRA would like to point out a couple concerns about the illogical ranking of high priority listed housing.
86-6	7/22/21	Merchant, Jennifer	The Sea Ranch Association	The Sea Ranch	N/A	OSRC	Land Use: Housing	Y	LU-27-C-LU-2: Addresses affordable and workforce housing. The two concepts are incompatible. Highly paid staff at The Sea Ranch can't afford to live on the coast. Most of TSRA employee housing are for the local business workers. TSRA is ready to engage in future implementation measures that acknowledge and prioritize the dire housing situation.
86-7	7/22/21	Merchant, Jennifer	The Sea Ranch Association	The Sea Ranch	N/A	OSRC	Public Facilities and Services	Y	Page PF-2-14: Page PF-2, Table C-PF-1- Update numbers for The Sea Ranch Water Company. Current correct numbers: <ul style="list-style-type: none"> <li>• Lots Served 1,862</li> <li>• Vacant Lots: 439</li> </ul> Page PF-13- Fourth paragraph: replace "The Sea Ranch, staffed by CalFire personnel funded through CSA 40" with "North Sonoma Coast Fire Protection District (serving The Sea Ranch and Annapolis), staffed by CalFire contract personnel" [note CSA 40's successor agency is no longer involved in our funding stream] Page PF-14- Second line: Correct name is North Sonoma Coast Fire Protection District Emergency Medical Services section: First paragraph, second line: delete "Gualala Health Center"; replace with "Redwood Coast Medical Services (RCMS)" Second paragraph, third line- strike "of communities"—this is a typo.

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87	10/1/21	Coates, Rick	EcoTourism and Green Travel	N/A	rcoates@sonic.net	Transportation	Transit	N	Policy CT-3f in the transportation section of the proposed Coastal Plan is insufficient to prevent increases in GHGs and VMTs. It should be policy to provide these facilities quite independent of their effect on GHGs and VMTs. If the County is serious about climate change (for which there is little tangible evidence), the County will simply prohibit projects that increase GHGs or VMTs..
88	10/6/21	O'Byrne, Eamon	SLT	Sonoma Land Trust	N/A	OSCR	Public Access	N	SL T is pleased to see the "preservation of natural resources ... outdoor recreation ... and the preservation of archaeological, historical, and cultural resources" and the protection of Environmentally Sensitive Habitat Areas (ESHA) as core principles of the LCP. Sonoma Land Trust supports the County's commitment to preserve and expand appropriate public access and use of the coast for all Californians. As the Coastal Act clearly states it is "essential to the economic and social well-being of the people of this state and especially to working persons employed within the coastal zone. In terms of specific suggestions, the Public Access Element FIGURE C-PA-1k (SubArea 10 Valley Ford) correctly identifies SL T's Estero Americana Preserve as a point of public access because we provide limited guided activities and environmental educational opportunities. Because the Estero Americana Preserve is not currently open for unguided public access and is surrounded by many private residential and ranching properties, we would recommend that it would be clearer if the maps denote whether or not a public access point is actually on public or private lands. For example, using a different color designation such as yellow for Point K2 to denote a public access point on private land or green for locations such as Point I-30 on map FIGURE C-PA-1j (SubArea 9 Bodega Bay Vicinity) on public land, would help the public and private landowners better understand potential limitations and differences between these access points.
89	10/6/21	N/A	The Sea Ranch Hosting Coalition	The Sea Ranch	N/A	Land Use	Vacation Rentals	N	Concerns about the Association's input to your commission for the October 7 meeting. While we support the Association's position on ESHAs we are concerned about its suggestion to add the words "community character" to the reasons for STR land use policies. Without qualification, "community character" can be a highly charged term with a very subjective interpretation. It has been used elsewhere in the past as a Trojan horse for implementing discriminatory housing policies. We believe that the County should limit any short term rental restrictions to the environmental reasons already proposed. The Sea Ranch Association's desire to add "housing" as a reason for STR land use policies on the ranch ignores the fact that there is no set of circumstances where a reduction in short term rentals would result in greater, or indeed any, availability of affordable housing. With the median The Sea Ranch real estate prices well in excess of \$1 million, this is economically unrealistic. Solutions to the housing challenge will need to be developed outside The Sea Ranch.

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90-1	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Vacation Rentals	Y	-Page 2-3 notes fast growth of vacation rental industry with now 550 residences registered and I would guess twice that many or more actually serving this function. So impact of these visitors is a primary concern.
90-2	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Housing	Y	<b>-Page 3 notes construction of new residential units- are any full-time residences? What is their impact?</b>
90-3	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Housing	Y	-Page 2-3: Do not understand population projections: 3,359 for 2023 on page 2, but page 3 is 11,700 with 3,283 new residents.
90-4	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Housing	Y	-The population in the Coastal Zone was 3,690 and 3,385 residents in 2000 and 2010, respectively (U.S. Census). The population estimates for 2018 and 2023 are 3,427 and 3,359 residents (Permit Sonoma GIS Community Profile).
90-5	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Housing	Y	-The Sonoma County General Plan 2020 Land Use Element for the Sonoma Coast planning region projects 3,283 new residents resulting in a total population of 11,700 by 2020 for the entire planning area, including inland portions.
90-6	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Land Use	Y	-Page 5: This sentence needs some punctuation- does not make sense: The Local Coastal Program contains 13 base zone districts twelve land use categories in five general use categories.
90-7	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Tourism/Water	Y	-Page 19: Commercial Tourist Areas: I think Jenner is already at its maximum for lodging with River's End and Jenner Inn and numerous registered and unregistered vacation rentals. Also, parking is already at a premium. No new lodging should be permitted. New retail or restaurants would also increase already existent problems with air pollution and parking, as well as impact on local services. Development in Jenner and Goat Rock is restricted by limited water supply. The Jenner Water System cannot support any more development. As noted on page 50 of this document, "Served by a mutual water system, there is a moratorium on water hookups due to inadequate water supply." ["there is" should be replaced by "Jenner has" to remedy dangling modifier and resultant lack of clarity in this sentence.] Full-time local residents are impacted by the number of visitors who occupy vacation rentals. Vacation renters tend to use water with abandon (statistics should be gathered on this) and make it expensive for full-time residents to live here. Restrictions on development should be strictly maintained and efforts should be made to encourage full-time affordable housing instead of tourist facilities.
90-8	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Land Use	Y	-Page 21: Criteria: I am concerned that these criteria are not adequate to prevent development of vineyards in agricultural lands; also concerned that vineyard development could lead to visitor-serving commercial uses.
90-9	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Vacation Rentals	Y	Page 22: Criteria for Commercial Services: -2) Any promotion of vacation rentals or lodging for visitors is ipso facto a reduction of opportunities for affordable or workforce housing. -4) "The amount of land designated for local-serving commercial uses shall be consistent with the population projected for the local market area." Two different projected population numbers are given on pp. 2-3. Additionally it's a difficult standard to apply when they are many second homes.

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90-10	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Vacation Rentals	Y	-Page 25: Permitted use on Rural Residential lands: restriction so single family residential use should be defined to limit vacation rental use. Suggest vacation rentals be limited to 20 weekends or 100 days a year—or less if possible. The category of single family residence is a misnomer if dozens of families are rotated through the same house every year. Suggest that through the MAC the coastal communities could recommend an appropriate restriction of vacation rentals. Limiting vacation rentals would increase affordable housing for full-time workforce residents.
90-11	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Biotic Protections	Y	-Page 48: "The California Coastal Act of 1976 encourages providing support facilities for visitors to the coast, especially those available to the public at a moderate cost." This statement needs to be updated. The Sonoma Coast is already at carrying capacity; additional visitors will have a detrimental impact on preservation of resources and sensitive habitats. Suggest we look to other counties' LCPs for ways to PROTECT while still allowing public access. The fact that (as stated on same page) Jenner is unincorporated makes it vulnerable to poorly reviewed development. Can the MAC become a body for local review?
90-12	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Water Resources	Y	-Page 50: "Additional inns, hostels, or similar facilities would be in keeping with Coastal Act policies which encourage visitor-serving facilities in existing developed areas. Served by a mutual water system, there is a moratorium on water hookups due to inadequate water supplies." Additional visitor-serving facilities would be a problem for Jenner. We need to state clearly that water and septic are not the only limitations.
90-13	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Public Access	Y	-Page 51: Bridgehaven is privately owned. Unclear what is meant by efforts to acquire public access.
90-14	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Vacation Rentals	Y	-Page 52: Chart lists 21 lodging/motel rooms in Jenner. Please note that cottages that are part of Jenner Inn are essentially vacation rentals, which means they have displaced housing for full-time workforce residents.
90-15	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Water Resources	Y	p. 53 "Policy C-LU-6a: "Encourage the development and expansion of visitor-serving and local-serving commercial uses within urban service areas and rural community boundaries where water supply and wastewater disposal requirements can be met." As stated elsewhere, I do not think there should be any encouragement or expansion of visitor or local facilities in Jenner. To expand would imply that you are going to allow water to be trucked in and waste to be trucked out – which would have negative consequences for traffic and other public services and parks.
90-16	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Vacation Rentals	Y	Policy C-LU-6b: Limit new visitor-serving commercial development to areas within designated urban service areas and rural community boundaries except for the lowest intensity development (i.e., guest ranches, and bed and breakfast inns, vacation rentals, and agricultural farmstays). The listed items are NOT low-intensity!!! How is this lowintensity measured? These terms need to be carefully defined and limited.
90-17	1/12/22	Sklenicka. Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Water Resources	Y	p.54 Policy C-LU-6c: Provide public restrooms and drinking water facilities where needed and appropriate as part of visitor and local-serving commercial development. (Existing LCP Revised) Jenner currently had NO public restrooms except port-a-potties which are provided by state parks at Visitor Center, by post office, and by privately owned gas station. How is this provision to be squared with water restrictions?

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90-18	1/12/22	Sklenicka, Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Water Resources	Y	Policy C-LU-6d: "Consider modest scale expansion of existing visitor-serving and localserving commercial uses outside of urban service areas and rural community boundaries where water supply and wastewater disposal requirements can be met." What does this mean???? "can be met" is very ambiguous and would seem to open a loophole for water to be trucked in / waste to be trucked out. Statement needs to be clear.
90-19	1/12/22	Sklenicka, Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Water Resources	Y	p. 55 Policy C-LU-6o: "Encourage a modest infill of visitor and local-serving commercial development in Jenner if water supply and wastewater treatment and disposal requirements can be met." This statement is troubling because of ambiguous reference to water and waste treatments! Met how? See previous remarks.
90-20	1/12/22	Sklenicka, Carol	N/A	Jenner, CA	carolsklenicka@gmail.com	Land Use	Vacation Rentals	Y	-GENERAL OBSERVATION: Given the limitations on responsible building, the looming issues of climate change, and the already overwhelming impact of tourism on local residents and local environment, it seems like a limitation on VACATION rentals would be the best way to protect our environment and increase affordable housing for fulltime residents who make up our workforce and maintain our communities and do the volunteer work that makes our parks attractive for all. -On a related note, every effort should be made to restrict any form of viniculture in the coastal zone. Grape-growing needs to be separated from agriculture.
91	2/3/22	Carpenter, Ernie	N/A	Sebastopol, CA	N/A	Land Use	Urban Growth		Expresses concern at the ability for people in rural to develop housing etc on their land, as it is gentrifying the rural community. Locals are having a hard time affording to live in new rural housing. "Fringe development looks like huge corporate-owned wine processing facilities, with restaurant and curlicue stores added."; "We now have housing complexes in agricultural zoning due to parcel loading.". The Board did not recognize water-scarce areas, fire-prone areas nor dispersed service costs in densification of properties. When services are dispersed, law enforcement and firefighting costs go up. There should not be commercial development on roads less than twenty feet wide. Mentions the downsides of vacation rentals and that returning vacation rentals to permanent housing could help with the housing crisis. Sewer upgrades must meet capacity needs.
92-1	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	-Page AR-2, 2.1, FARMLAND IN THE COASTAL ZONE  Comment: There is no explicit mention of the Williamson Act and Agricultural Preserves in this section.  Recommendation: Here is suggested language from the 2008 LCP: "Many landowners in the Sonoma coastal zone have demonstrated a commitment to agriculture by entering into Williamson Act contracts. The California Land Conservation Act of 1965 (the Williamson Act) allows counties to establish agricultural preserves and thereby give tax reductions to landowners engaged in commercial agricultural operations. Under current law, lands under contract are appraised by the county assessor for their agricultural productivity rather than market value. When an agricultural preserve is formed, State law requires all lands in the preserve to be zoned to prevent land uses incompatible with agriculture within the preserve. In signing a contract with the County, the landowner agrees to retain his land in agricultural uses for at least ten years."



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92-2	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Page AR-4, 4.1 RESIDENTIAL SUBDIVISION POTENTIAL  Comment: What does RESIDENTIAL SUBDIVISION POTENTIAL mean?  This header implies that Ag land will be converted to residential subdivisions, in contradiction to Page AR-2, 1.1 PURPOSE: "The California Coastal Act protects productive resource lands, including agricultural lands, and establishes agriculture as a priority use and emphasizes the retention of agricultural land in production."  Recommendation: Please directly cite Coastal Act Section 30222:  "The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry."  "Complaints about noise, odors, flies, spraying of pesticides, and similar nuisances related to agricultural practices may discourage and sometimes prevent farmers from managing their operations in an efficient and economic manner."</p>
92-3	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Comment: Pesticide applications are not necessary to efficient and economic agricultural operations. Witness the burgeoning market for organic products and the public and environmental health risks of pesticide application. Their use in the Coastal Zone is inadvisable altogether, due to both human and biotic impacts such as pollinator, bird and mammal by-kill.  Recommendation: Please omit "spraying of pesticides".</p>
92-4	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Objective C-AR-1.1: "Avoid the conversion of agricultural lands to residential or non-agricultural commercial uses."  Comment: "Avoid" is too weak a word to use in the context of Ag land commercial uses.  Recommendation: Please change the word "avoid" to the word "prohibit".</p>
92-5	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Policy C-AR-1a:  "The following criteria shall be used for approval of subdivisions on designated Land Extensive Agriculture or Diverse Agriculture:  (b) agricultural conversions shall be limited and evaluated on a case-by-case basis...."  Comment: As has been seen in the costly and contentious 5-year struggle to create a Sonoma County Winery Event Ordinance, lack of clear criteria for application permitting, administered on a case-by-case basis, leads to unnecessary expenditure of County time and effort as well as public conflict.  Recommendation: We strongly recommend outlining specific criteria for agricultural conversions in this LCP Update for public review, in advance of its presentation to the Board of Supervisors.</p>

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92-6	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Policy C-AR-1b: "Subdivisions on designated resource and agricultural lands shall be permitted only for development related to the pursuit of either agriculture or forestry, as appropriate; and only with mechanisms such as open space or agricultural easements to ensure the long-term protection of agriculture and resource production. (EXISTING LCP REVISED)"</p> <p>Comment: Objective C-AR-1.2 and the Policies which follow express intent and detailed plans, at the discretion of Permit Sonoma, to convert agricultural land in the coastal zone to residential subdivisions. Even with the proviso that they.... "shall be permitted only for development related to the pursuit of either agriculture or forestry, as appropriate", there is no clear definition of the word "appropriate" or specific examples of what those pursuits would be. Since agricultural product promotion is deemed essential to agricultural profits in Sonoma County, it is logical to assume that there would be more visitor-serving commercial uses of agricultural lands in the Coastal Zone, such as promotional events, as a result.</p> <p>Recommendation: We strongly recommend that Objective C-AR-1.2 and Policies C-AR-1a and 1b be struck from the LCP Update entirely and replaced with specific criteria for subdivision permitting, as stated above.</p>
92-7	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Page AR-6, PROTECTION OF AGRICULTURAL LAND</p> <p>GOAL C-AR-2: "Maintain agricultural production by limiting intrusion of urban development on agricultural land.</p> <p>Objective C-AR-2.1: "Limit intrusion of urban development in agricultural areas."</p> <p>Comment: "Limit" implies intention to permit urban intrusion in agricultural lands. Even with conditions, this is contradictory to the Coastal Act and contradicts the previous rhetoric of PROTECTION OF AGRICULTURAL LAND.</p> <p>Recommendation: Replace the word "limit" with the word "prohibit".</p>
92-8	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Objective C-AR-2.3: "Limit extension of sewer and other urban services beyond the Bodega Bay Urban Service Area Boundary and Rural Community Boundaries."</p> <p>Comment: "Limit" again implies intention to permit extension of sewer and other services, presumably water, beyond the Bodega Bay Urban Service Area Boundary and Rural Community Boundaries. The Coastal Zone is a Class 4 Water area and drought is the new normal.</p> <p>Recommendation: Change the word "limit" to the word "prohibit", or drop this Objective and any other language promoting public services outside of urban or rural community boundaries, save for failed septic systems that pose a public health risk.</p>

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92-9	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Policy C-AR-2c: "Extension of urban services....shall be limited to....solve existing health and safety problems, unless allowed by the Public Facilities and Services Element or Policy C-AR-7b (aquaculture)."</p> <p>From Public Facilities and Services, Policy C-PF-2a: "In areas with limited service capacity, new development for a non-priority use, including land divisions, not specified above, shall only be allowed if adequate capacity remains for Coastal Act priority land uses."</p> <p>and Policy C-PF-2e(4): "Use agreements, covenants and zoning to limit the growth inducement potential of extension of public sewer services."</p> <p>Comment: These policies are essentially providing for new development for non-priority uses outside of urban and rural community boundaries by extension of water and sewage services. There is no definition of "adequate capacity" remaining for Coastal Act priority land uses. The use of "agreements, covenants and (pending) zoning is not defined, specific nor enforceable.</p> <p>Recommendation: Change Policy C-AR2c by dropping the words: "...unless allowed by the Public Facilities and Services Element or....".</p>
92-10	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Page AR-7</p> <p>Policy C-AR—3a: ".....and spraying of chemicals."</p> <p>Comment: "Spraying of chemicals" does not specify what type they may be, (eg, copper sulfate, synthetic pesticides, hormones or fertilizers). There are differences between the public health effects of various sprays.</p> <p>Recommendation: Please specify the types of chemical sprays being referred to and expressly exclude the spraying of pesticides or application of rodenticides in the Coastal Zone.</p>
92-11	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Page AR-8, 4.3 AGRICULTURAL SUPPORT USES</p> <p>Vineyards and Wineries in the Coastal Zone (margin)</p> <p>Comment: The overarching theme of this aside is one of reassurance that there have never been wineries in the Coastal Zone for a variety of reasons. However, it is noted that "there are wineries within a mile of the Coastal Zone" and that "a Coastal Development Permit would be required", an historically obtainable goal. Given the desirability of a cooler climate for many wine grape varieties in the current setting of Climate Change, it is easy to picture vineyards and wineries permitted in the Coastal Zone in future. The vast majority of vineyards in Sonoma County use synthetic pesticides, remove trees, rip land in an erodible manner and require access roads and heavy equipment. These practices would be ecologically disastrous in the Coastal Zone and strongly opposed by the public.</p> <p>Recommendation: Prohibit vineyards and wineries in the Coastal Zone.</p>
92-12	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>4.3.2 Agricultural Visitor-Serving Uses (Agricultural Tourism)</p> <p>"Examples-of these uses are farm-stays.....".</p> <p>Comment: There is countywide difficulty passing a vacation rental ordinance and no vacation rental regulation whatsoever in the Coastal Zone.</p> <p>Recommendation: Please define "farm-stay" and "hosted rentals on agricultural land with regard to their physical setting, purpose, host requirements and activities related to the experience of farm life for visitors.</p>

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92-13	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Page AR-9, Goals, Objectives and Policies   Agricultural Support Uses</p> <p>Policy C-AR-5b: "Storage facilities shall be permitted for agricultural products grown, prepared, or processed on-site.</p> <p>Comment: It is not unusual for agricultural products grown out of area to be combined with local products, for commercial purposes.</p> <p>Recommendation: Change to "Storage facilities, processing and promotional activities shall be permitted...".</p>
92-14	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Table C-AR-3 (NEW) : Row crops (cannabis) are Principally Permitted "by right", with no permit required. Vineyards are Principally Permitted at the discretion of Permit Sonoma. Constraint "2" does not provide appeal details. The "map on file at Permit Sonoma" per which appealable areas are shown is not displayed here, nor described.</p> <p>Comment: As the LCP will determine Coastal Zone Policy for the next 20 years, it would behoove us to consider the potential water-depleting and other consequences of cannabis farming and processing, vineyards, wineries and events for both these forms of agriculture in the Coastal Zone. There are no criteria listed for discretionary permitting of wineries by Permit Sonoma. There is no mention, let alone regulatory language, re: events on agricultural lands.</p> <p>Recommendation: Prior to presentation of this Draft LCP Update to the Board of Supervisors, specific policy re: cannabis growing and processing in the Coastal Zone should be written and offered for public review.</p> <p>Likewise, Permit Sonoma criteria for discretionary permitting of vineyards and wineries and event policy for agricultural lands should be written and publicly reviewed.</p>
92-15	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Page AR-11, Goals, Objectives and Policies   Farmworker Housing</p> <p>Recommendation: Please add a policy prohibiting conversion of farmworker housing to visitor-serving uses.</p>
92-16	3/3/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Agriculture	Agriculture	Y	<p>Marine Aquaculture Fishing</p> <p>Comment: Current language regarding aquaculture should be removed and replaced with Coastal Act and OPC consistent policy on aquaculture including policies regulating onshore support facilities with specific requirements of ocean water intake/discharge pipes for onshore aquaculture and—as the County controls leases to Sonoma Coast tidelands—also include policies that protect seagrass and salt marsh habitat, promote practices that reduce marine debris, restrict cultivation of non-native species, protect wildlife habitat, and address spatial conflicts with recreational and commercial fishing uses.</p>

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93-1	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Introduction	Introduction	Y	<p>Page INT-2, 1 PURPOSE:  Comment: "... policies related to coastal development....adopted....in General Plan 2020" inappropriately assumes development and imposes General Plan policy in the Coastal Zone. The LCP is Not Interchangeable with the Countywide General Plan: In the context of the LCP Update, General Plan 2020 is not arbitrarily transposable to the Sonoma Coast. Transmigration of some of the more concerning aspects of the Countywide General Plan into the LCP should not take place now, nor should it be enabled in the undefined future. Our coast is a unique and irreplaceable asset and deserves the kind of profound respect and due care that it was accorded during the thorough public process by which the first Sonoma County LCP was initially formulated and adopted."  Recommendation: Please strike the sentence beginning "This Update... the one following: "In addition...". "This Update maintains the intent of its original authors to conserve this priceless and fragile natural resource which provides a powerful buffer against climate change. New science is included in the Elements and Policies with regard to sea level rise (2100 planning horizon), carbon sequestration, conservation of biotic resources, clean energy generation, water quality and re-charge, aquaculture, public access and geologic hazards. The issues of open space, viewscape, small coastal community preservation, public safety, appropriate housing, short-term rentals and a sustainable form of tourism are addressed. In addition, a strike-through comparison of this draft is provided." (Please provide a link here.)</p>
93-2	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Introduction	Introduction	Y	<p>"This updated Local Coastal Plan considers growth on the Sonoma County as projected, given historic population growth trends and anticipated increases in visitor-serving uses."  Comment: Projections of growth and development in the coastal zone as presumed by previous rates of growth is no longer environmentally viable. The California Coastal Act was written 44 years ago, before climate change was generally recognized and before Bay Area population and wealth burgeoned, creating unimaginable resource and tourism pressures on the Sonoma Coast. In general, the concept of carrying capacity should apply to any new policy applied to the coastal zone, where water, open space, viewscape, affordable housing, emergency response, roads and other infrastructure are in short supply compared to demand. The 2021 Draft LCP does not reflect the reality of our times nor the necessary restraints required to conserve our coastline over the next 20 years.  Recommendation: Please omit the sentence in red(QUOTATIONS) above.</p>
93-3	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Introduction	Introduction	Y	<p>Page INT-2 (typo-should be INT-11), 5 PUBLIC PARTICIPATION  • Save the Sonoma Coast should be Save the Sonoma Coast.</p>

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94-1	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	<p>Important missing components strongly recommended for inclusion:</p> <ul style="list-style-type: none"> <li>-The list of Permit Sonoma's criteria for development applications requiring a Coastal Development Permit (vs a Ministerial Permit);</li> <li>-Standard 4-week advance public and MAC notice for CDPs, by listserve and public notices;</li> <li>-Minimum 4-week advance public and MAC notice for Ministerial Permits, by listserve</li> <li>-Required public hearings for any new housing or major remodel on the coast (as used to be the norm);</li> <li>-Mention of Environmentally Sensitive Habitat Areas, explicitly listed as a form of deliberate "non-human use" with reference to OSRC Element corresponding section.</li> <li>-A ban on the use of synthetic pesticides and rodenticides in the Coastal Zone (as successfully established in the Santa Monica LCP and Malibu)</li> </ul>
94-2	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	<ul style="list-style-type: none"> <li>-Page LU-4: A definition of Principally Permitted Uses is needed, as described in the Coastal Zoning Code, both in Land Use and in the Glossary;</li> </ul>
94-3	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	<ul style="list-style-type: none"> <li>-Page LU-9, Timber: of forest values beyond timber harvest. We recommend the insertion in the right-hand margin: "In addition to provision of timber, forests are critical for essential ecological functions, such as carbon sequestration, clean air, water conservation, soil health, erosion prevention and habitat for plants, animals and fungi. Forests and woodlands also provide other human-centric benefits such as scenic views and recreation potential. These specific forest values are important to the quality of the environment and life in the County and are likewise addressed in the Water Resources Element and other sections of this Open Space and Resource Conservation Element."</li> </ul>
94-4	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Vacation Rentals	Y	<p>Vacation Rentals are displacing permanent residents. There are a variety of ethics and morals among renters as well, and bad behavior can occur. This bad behavior negatively impacts public safety and needs to be addressed.</p> <p>Our recommendations:</p> <ul style="list-style-type: none"> <li>a) Limit the total number of vacation rentals at the Coast.</li> <li>b) Provide a community with the option of becoming an exclusion zone free of vacation rentals.</li> <li>c) Maximum occupancy rates not to exceed two persons per bedroom, plus an additional two persons.</li> <li>d) 24-hour management must be available.</li> <li>e) Each vacation rental location must demonstrate that it has adequate onsite parking on its own parcel, reliable garbage service, and noise must be controlled during quiet hours.</li> <li>f) The "three-strikes" principle utilized elsewhere in Sonoma County must be applied at the coast, i.e.; three verified violations at one property should lead to a one-year hiatus in vacation rental uses at that site.</li> </ul>

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94-5	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	<p>Page LU-4, Land Use Designations, Open Space (OS), Corresponding Zoning Districts: Planned Community (PC)</p> <p>Comment: Further development of Planned Communities in the Coastal Zone with the usual tennis courts and golf courses are untenable for multiple reasons (eg, inadequate water supply, impacts on wildlife, viewscape, erosion, etc) and should be prohibited from the coastal zone entirely. We agree with the Coastal Commission's concern that there is intrinsic adverse impact on Open Space resources by Planned Community development.</p> <p>Recommendation: Drop Planned Community Zoning from Open Space.</p>
94-6	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	<p>Page LU-4-5, 1.3 COASTAL LAND USE CATEGORIES, Other Permitted Uses: Comment:</p> <p>There is potential for mis-use of the category of Other Permitted Uses by undefined discretionary approval of applications, be they outright or gradual, cumulative, piecemeal approval of Uses. For enforcement purposes, the word "discretionary" is too vague.</p> <p>Recommendation: Please provide the link or full text of the Coastal Zoning Code for Other Permitted Uses. Please drop the word "discretionary".</p>
94-7	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	<p>Page LU-6, Land Extensive Agriculture and Diverse Agriculture, Principally Permitted Use: Comment: Vineyards and cannabis grows are incompatible with coastal carrying capacity, eg: the Coast's Class 4 water status, further Climate Changeinduced drought, pesticide usage, intrinsically soil-eroding growing practices, the visual blight of hoop houses, increased traffic on Hwy 1 and the need for more emergency and law enforcement services at general taxpayer expense.</p> <p>Recommendation: Explicitly exclude cannabis-grows and vineyards and their attendant promotional activities as Ag PPUs in the coastal zone.</p>
94-8	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	<p>Page LU-8: Resources and Rural Development:</p> <p>Comment: Mining in the Coastal Zone, especially in the Cheney Gulch Mineral Resources (MR) interest area should not be allowed, given the known propensity of the area for both gully and sheet erosion and geologic instability. The associated transportation mechanisms for any produced rock, and the high visibility of any resultant mining scars from Highway One; a large cross-country automated conveyor apparatus proposed for Cheney Gulch in recent mining plans and leading to a crushed rock loading facility for transit by barges out of Bodega Bay, also poses the threat of harmful maritime slurry spills and vessel collisions in our harbor.</p>
94-9	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	<p>Designation Criteria</p> <p>2. Land contains natural resources such as water, timber, geothermal steam, aggregate, or soil."</p> <p>Comment: Mining in the Coastal Zone, especially in the Cheney Gulch Mineral Resources (MR) interest area should not be allowed, given the known propensity of the area for both gully and sheet erosion and geologic instability. The associated transportation mechanisms for any produced rock, and the high visibility of any resultant mining scars from Highway One; a large cross-country automated conveyor apparatus proposed for Cheney Gulch in recent mining plans and leading to a crushed rock loading facility for transit by barges out of Bodega Bay, also poses the threat of harmful maritime slurry spills and vessel collisions in our harbor.</p>

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94-10	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	Page LU-23: Policy C-LU-6o: Comment: Served by a mutual water system, Jenner currently has a moratorium on any further development of visitor-serving commercial facilities due to existing infrastructural inadequacies and also public safety hazards. Recommendation: Delete this policy.
94-11	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	Policy C-LU-6q: Comment: Bridgehaven is not a “resort”, but a small number of older, fragile, single-family dwellings built close to the flood level of the Russian River along Willow Creek Road, which accesses the Willow Creek portion of Sonoma Coast State Park. It is located just downstream from the confluence of Willow Creek, the last monitored anadromous fish-bearing tributary to the Russian River before it empties into the Pacific Ocean. Recreational development of this sensitive and fragile habitat is contradictory to basic principles of coastal habitat conservation. Recommendation: Delete this Policy.
94-12	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	Page LU-25, Policy C-LU-2g: Comment: This policy probably violates State law, LAFCO policy, Public Health and other County policies. It does not specify that the parcel has to be contiguous to the BPUD. What uses that directly “relate to and support fishing” can’t be in the USB? A restaurant selling local fish? Boat yard? Net making? If there is a parcel that may in the future meet this criteria, name the parcel(s) by #AP and note in the LCP that applicants may apply in the future for a GP amendment, an LCP amendment and annexation to the BPUD. Otherwise, this is an invitation for endless speculation. Recommendation: Delete this policy.
94-13	3/2/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Land Use	Y	Page LU-26, Policy C-LU-2m: Comment: Water and sewage extensions to parklands outside urban boundaries, as with Policies C-PF-2 b and e, is antithetical to the intent of the Coastal Act to protect natural resources. It invites extra-urban development. It is impractical and was taken from the GP, referring to cities with extensive sewage and infrastructure. Recommendation: Delete this policy.



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95-1	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page C-OSRC 41, 42, Mineral Resources, Policy C-OSRC-10a: "Consider areas designated by the State Mining and Geology Board as regionally significant for construction grade aggregate as priority sites for aggregate production and mineral extraction. Within the Coastal Zone, these areas are currently limited to sandstone deposits located in Cheney Gulch, approximately 2.5 miles east of Bodega Bay in western Sonoma County.2 Review requests for designation of additional areas for consistency with the Coastal Act, Local Coastal Plan, and the....." Aggregate Resources Management (ARM) Plan. (GP2020 REVISED)"</p> <p>Additionally, the project must demonstrate that and economic need exists for aggregate materials produced at the site and that full reclamation of the site is feasible and that reclamation will fully restore ecological function of the site to that which existed prior to any mining operation. (GP2020 REVISED)".</p> <p>Full reclamation as described is not physically possible. Disruptions of habitat, soils, plants, etc, are not remediable, based on current science (eg, see Fremontia, Vol 1, #48, ETHICS OF PLANT REINTRODUCTION IN THE 21ST CENTURY, by Naomi Fraga).</p> <p>Recommendation: Drop aggregate and aggregate production from the list of protected land uses in both Land Use and the Open Space and Resource Conservation Elements.</p>
95-2	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page C-OSRC 3, 1.1 PURPOSE, 1st paragraph:  Comment: The opening paragraph of OSRC is out of touch with the rapidly unfolding reality of our new climate and natural world.  Recommendation: Drop the words "wherever possible" in the first sentence and the words ""managed production of resources". Change to: ".....open space for the conservation and restoration of natural resources.....cultural resources". Add: "Modern Science shall provide guidelines and best practices for carbon sequestration and climate change mitigations throughout this Element."</p>
95-3	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	OSRC	Y	<p>Page C-OSRC 3, 1.1 PURPOSE, 2nd paragraph:  Comment: Currently, while lucrative for business owners, tourism in the Coastal Zone is unregulated and has adverse effects on the quality of life for both animal and human residents.  Recommendation: Change first sentence to: "...Sonoma County Coast and to maintain a science-based balance of tourism activities with current and future ecosystem, residential and natural resource limitations."  Add 3rd paragraph (or new policy) as enforcement: "When human activities lead to or are possible consequences of actions that may damage or harm human or other living organisms' health through the neglect, damage, destruction or elimination of individuals, populations or their habitats and physiological, behavioral, or ecological requirements, such actions shall be suspended until ample scientific evidence and ethical consideration can be applied to determine the least harmful course of action. Consideration of must be extended to future generations of all species that might be affected, regardless of any apparent physical disjunction."</p>

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95-4	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-5, Vista Points:  Comment: There are many reasons why development of vista points as described above are a bad idea for the Coastal Zone:  1) Vista points (parking lots) would themselves have a negative impact on "other coastal resources": scenic landscapes;  2) Hwy 1 is over-capacity already, with miles-long traffic back-ups on weekends and holidays. Vista Points and turn-outs would contribute to more vehicle traffic, further aggravating the situation;  3) Emergency personnel are already unable to respond to various accidents in a timely fashion due to traffic on Hwy 1;  4) "Parking areas, interpretive signs and restrooms would require grading of fragile, narrow bluff-tops and servicing of septic waste and garbage;  5) "Safe ingress and egress" would require road widening in a zone of highly erodible soils and steep bluffs.  6) Climate Change dictates a necessary reduction in vehicle miles and will put construction in areas of geologic instability at accelerated risk of erosion and bluff failure.  Recommendation: Drop the section on vista points and references to them from the Element.</p>
95-5	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-6, Scenic Corridors:  Comment: It is ironic that Hwy 1 is eligible for designation as a Scenic Highway, but our county has never applied for what would be an easy and certain approval. Per CalTrans, a required Corridor Protection Program for a Scenic Highway includes "visual quality protection measures that exist at the local level in five legislatively required areas:  1. Detailed land and site planning;  2. Regulation of land use and density of development;  3. Control of outdoor advertising;  4. Careful attention to and control of earthmoving and landscaping; and  5. The design and appearance of structures and equipment.  Public participation in developing any new elements is very important if the program is to have popular support."  Recommendation: Apply for official Scenic Highway designation for Highway 1.</p>
95-6	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Criteria for Establishing Buffer Areas  ATTACHMENT "M":  Comment: This criterion allows for development in ESHA buffers.  Recommendation: Any application specifying development in an ESHA buffer must be public and MAC-noticed and reviewed by the California Coastal Commission.</p>
95-7	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-14, Biotic Resources of the Coastal Zone:  Recommendation: Change the first paragraph wording to: "The four main biotic resources categories represented in this section are streams and riparian corridors, wetlands, marine resources, and terrestrial habitats. Within the four main categories are many more subcategories, all of which are inter-dependent and necessary to the healthy functioning of the Coastal Zone as a whole. Included here are goals, objectives, and policies for the protection and management of such resources....."</p>

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95-8	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	3.2 BIOTIC RESOURCE PROTECTIONS GOAL C-OSRC-5: Recommendation: Add: "...through inventories, assessment, conservation measures, monitoring, and analysis."
95-9	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Objective C-OSRC-5.1: Comment: This is an incomplete and non-specific Objective. Recommendation: Change to "...protect all native vegetation and wildlife. Specifically map occurrences of special status species, wetlands, sensitive native communities, and areas of essential habitat connectivity, including minimum 200' buffers to include areas for potential species' future movement and expansion."
95-10	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Objective C-OSRC-5.6: Comment: Biotic Resources are dwindling at a rapid rate and cannot be replaced. Recommendation: Change to: "Protection of Biotic Resources will take precedence over expansion of agricultural production, development, timber and mining operations, and other land uses."
95-11	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-15-16, Streams and Riparian Corridors: See the 3 paragraphs describing streams and riparian corridors. There is no mention of upslope impacts on stream hydrology, water quality, and habitat connectivity, from timber extraction, agriculture and livestock ranching. Comment: Even now, permits for timberland conversion to vineyards are being approved, with resultant siltation and pesticide run-off into tributaries of the Gualala River. Recommendation: Insert as next-to last line in first para on page 16, after "...fish and wildlife.": "Upslope impacts on stream hydrology, water quality, and habitat connectivity, including those related to timber extraction, agriculture and livestock ranching, will be reflected in Policies."
95-12	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-17, Wetlands, 1st paragraph: Comment: Coastal wetlands have been reduced by 67% ( <a href="https://defenders.org/blog/2017/08/californias-disappearing-wetlands-face-new-perils">https://defenders.org/blog/2017/08/californias-disappearing-wetlands-face-new-perils</a> ). Recommendation: Change to: "Salt and brackish marshes and all wetlands have been reduced 67% from their historical extent and will be reduced further with climate change. They are critical habitat to restore and protect. Drop "where feasible".
95-13	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-17, Marine Habitats, 2nd paragraph: Recommendation: Please add: "These mudflats also contribute to Bodega Bay's designation in 2001 as an Important Bird Area (IBA) by the American Bird Conservancy, one of 500 Globally Important Bird Areas."

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95-14	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-17-18, 5th Paragraph:  Comment: There is insufficient description of the importance of protection of haul-out areas, which even today are subject to human and dog intrusions, with inadequate State Parks staffing to monitor the sites.  Recommendation: Change to: "Stellar sea lions, protected under both the Endangered Species Act (ESA) and the Marine Mammal Protection Act (MMPA), along with California sea lions and other pinnipeds, also protected by the MMPA, haul out on offshore intertidal areas that become exposed at low tides as well as on offshore rocks.....Harbor seals, in addition to using offshore rocks along the Sonoma coast, specifically use sandy beaches at Sonoma coast locations at The Sea Ranch, Sonoma Coast State Park, Goat Rock Beach in Jenner and in the intertidal areas of Bodega Bay to rest, molt, give birth, and nurse their pups."</p>
95-15	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-18, Terrestrial Habitats, 3rd paragraph:  Comment: Per expert botanist Peter Warner, there are still rare native plant populations observable in our coastal grasslands.  Recommendation: Please change to: "...Sonoma County's historic coastal grasslands are now considered reservoirs of habitat remnants as well as microsites supporting extant populations of rare plants."</p>
95-16	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page 18, continued, last sentence:  Comment: This sentence is inaccurate, per Peter Warner.  Recommendation: Change to: "Coastal prairie (historically or currently as coastal non-native annual or perennial grassland) and scrub habitats are extensive on private as well as on public lands within the coastal zone from Estero Americano north to Russian Gulch."</p>
95-17	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-19, 3.3 ENVIRONMENTALLY SENSITIVE HABITAT, Policy COSRC-5b(1), (2):  Recommendation: Add: "...law, including potential wildlife corridors, watercourses, nesting, prey habitat and mating areas."</p>
95-18	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Policy C-OSRC-5b(2)(10)-re:ESHA designation—"Habitats that Support Listed Species":  Recommendation: Change to: "Habitats, wildlife corridors and areas that contribute to the viability of Listed Species or those of impending rarity."</p>
95-19	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>(11) "Tree stands that support raptor nesting or monarch populations"  Recommendation: Change to: "Tree stands that support raptor and prey perching or nesting and their food sources, and/or monarch populations."</p>
95-20	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-20, Policy C-OSRC 5b (8):  Comment: After all the protective language re: ESHA, this policy comes as a shock, approving development in ESHA with theoretical mitigation as the rationale. There is no adequate mitigation for destruction of ESHA, particularly off-site attempts to construct equivalent ESHA de-novo.  Recommendation: Strike this policy as it stands. Change to: "If proposed development is a permissible use and there is no feasible alternative, including the no project alternative, that can avoid significant impacts to ESHA, then the application shall be referred to the Coastal Commission, with noticed to the MAC and the public at large. The applicant shall be informed that no further action is possible until the Coastal Commission has made a determination of the viability of the application."</p>

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95-21	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Policy C-OSRC-5b(10):</p> <p>Comment: As immediately above, this policy flies in the face of previously stated ESHA protections.</p> <p>Recommendation: Strike this policy as it stands. Change to: "If the application of the policies and standards contained in this Local Coastal Plan regarding use of property designated as ESHA or ESHA buffer, including the restriction of ESHA to only resource-dependent use, would likely constitute a taking of private property without just compensation, then the application shall be referred to the Coastal Commission, with noticed to the MAC and the public at large. The applicant shall be informed that no further action is possible until the Coastal Commission has made a determination of the viability of the application."</p>
95-22	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-22, Policy C-OSRC-5c(3):</p> <p>Comment: "NMFS recently completed a programmatic biological opinion in consultation with the U.S. Corps of Engineers (SF District) that encourages the use of bio-engineered bank stabilization when protecting critical infrastructure threatened by streambank erosion. Designing and implementing bio-engineered projects in accordance with the programmatic biological opinion will significantly streamline federal project permitting.</p> <p>Recommendation: Strike the word "encouraged" and replace it with "required." End with the sentence, "Design and implement bio-engineered projects in accordance with the programmatic biological opinion to significantly streamline federal project permitting."</p>
95-23	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Policy C-OSRC-5c(6):</p> <p>Comment: This policy refers to "Anadromous Fish Streams", but qualifies that terms as "Chinook and Coho Salmon Habitat". Steelhead are a federally-listed anadromous species, and as such should be included in the above qualifier.</p> <p>Recommendation: Change to "In Anadromous Fish Streams (Chinook and Coho Salmon and Steelhead) Habitat,..."</p>
95-24	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-23, Policy C-OSRC-5c(8):</p> <p>Comment: "Per NOAA's advisory letter to Permit Sonoma on 2/8/2017: "We request that NMFS be included as an agency "responsible for natural resource protection", and thus be afforded the opportunity, like the California Department of Fish and Wildlife, to review and provide comment on permit applications near streams or waterways."</p> <p>Recommendation: Change to: "As part of the environmental review process, refer permit applications near streams to California Department of Fish and Wildlife and other agencies responsible for natural resource protection, including NMFS. (GP 2020)"</p>
95-25	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>3.5 WETLANDS, Policy C-OSRC-5d(1):</p> <p>Recommendation: Add: "...marshes, ponds, seeps, reservoirs, pond edges, seasonally inundated grasslands and scrub wetlands), as well as the contiguous upslope portions of riparian habitats."</p>
95-26	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Policy C-OSRC-5d(5):</p> <p>Comment: does not specify best practices for dredging, etc, available in the Marine Sanctuary guidelines.</p> <p>Recommendation: After "Appendix E-5", insert: "Best practices for dredging, etc, shall be guided by Marine Sanctuary guidelines."</p>

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95-27	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-24, Policy C-OSRC-5d(6), (7): Comment: This policy allows for new construction with mitigations within 100' of wetlands. These are not science-based policies and do not anticipate future industry such as aqua-farming. Recommendation: Change to "Construction of agricultural, commercial, industrial, residential and future potential structures, such as those associated with aquaculture...Between 100 to 300 feet, unless an independent environmental assessment or qualified biologist shows the proposed activity/development would not have an adverse impact on the wetland."
95-28	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-26, Policy C-OSRC-5e(3): Comment: Both of these policies are intended to protect biological resources (nesting birds on offshore rocks and disturbance of marine mammal haul outs). But there is no mechanism specified for enforcement of the prohibitions against trespass on or disturbance of these sensitive habitats. We agree with The Sea Ranch in suggesting a new policy: Recommendation: "Policy C-OSRC 5e (5a): Encourage the joint development of a plan by State and County Parks, USFWS, BLM and Stewards of the Coast and Redwoods for protection of these biological resources (nesting birds on offshore rocks; marine mammal haul-outs) through noticed, enforceable public access limitations."
95-29	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Policy C-OSRC-5e(4)(3): Comment: As written, this policy language is not strong enough to protect special status species. Recommendation: Change to: "...implemented to prevent impacts on special status species....".
95-30	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Policy C-OSRC-5e(6): Comment: "Encourage" is very weak language here and ANNUAL not sufficient. Stewards currently monitors on a bi-weekly basis and monitoring should occur on a weekly basis during March-June pupping season and the August-September molting season. Recommendation: Change to: "Collaborate with the California Department of Fish and Wildlife to monitor Marine Mammal Haul-Out Grounds on a biweekly basis and on a weekly basis during pupping season (March through June) and molting season (August through September), in order to determine their condition and level of use and to incorporate this information into its management plan for marine mammals."
95-31	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-27, 3.7 TERRESTRIAL HABITATS, Policy C-OSRC-5f(1): Comment: The exemption of undefined ""support facilities"" is improper. Recommendation: Please define and give examples of "support facilities".
95-32	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Policy C-OSRC -5(5): Comment: It would be ecologically destructive to build parks and support facilities that require sand removal. Recommendation: Drop this policy.
95-33	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Policy C-OSRC-5f (2): Comment: More detail is needed to account for current public practices and dog incursions into habitat. Recommendation: Change to: "On dunes/coastal strand and other sensitive areas frequented by people, carry out the following..." (2) Post signs...limiting public access, including dogs, to protect plant and wildlife communities."

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95-34	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-28, Policy C-OSRC-5f(6):  Comment: Currently, we are losing native trees and woodlands at an alarming rate to development of various types, particularly viticulture and soon cannabis grows. This policy language is permissive, vague and unrealistic with regard to mitigation.  Recommendation: Change to: "The removal of native trees and fragmentation of woodlands shall be prohibited without a widely noticed public hearing. Any trees removed with public consent shall be replaced....and permanent protection of other existing woodlands shall be provided in addition to replacement planting."</p>
95-35	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-29, Policy C-OSRC-5f(9):  Commented [A35], Peter Benham for the CCC: "Redwoods, Douglas Fir, and other rare or important tree species should be defined as ESHA within the ESHA definition given in this chapter."  We agree and would like to see this recommendation appear in the Draft.</p>
95-36	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Policy C-OSRC-5f(10):  Comment: This list of protected bird species is incomplete.  Recommendation: Change to: "...near osprey, eagle and kite nests and any other threatened or endangered birds' nests, the following ....."  Remove the word ""Osprey"" and simply state: ""Nest sites located adjacent....."."</p>
95-37	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-30, Policy C-OSRC-5f(13):  Recommendation: Change "minimized" to "prohibited".</p>
95-38	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>4 COMMERCIAL FISHING AND SUPPORT FACILITIES POLICY 4.1  BACKGROUND, Climate Change  Recommendation: Please include in this section a link to the EPA's website for a modern summary of effects of Climate Change on Fisheries.</p>
95-39	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-33, Marine Debris, State and Federal Programs:  Comment: No mention is made here of a recent collaboration between Sonoma County and the Greater Farallons National Marine Sanctuary, which specifies best practices for dredging operations.  Recommendation: Reference and adhere to the Marine Sanctuaries' best dredging practices document. Reference, update policies for consideration of beneficial reuse of dredge materials, and adhere to the Greater Farallones National Marine Sanctuaries Coastal Resilience Plan for Bodega Harbor (<a href="https://nmsfarallones.blob.core.windows.net/farallones-prod/media/docs/20191101-coastal-resilience-and-sediment-plan.pdf">https://nmsfarallones.blob.core.windows.net/farallones-prod/media/docs/20191101-coastal-resilience-and-sediment-plan.pdf</a>).</p>
95-40	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	<p>Page OSRC-37, Soil Erosion:  Comment: The second sentence implies that landowners will be exempted from erosion control policy. Per NOAA letter to Permit Sonoma of 2/8/2017 in this regard: "The last sentence appears to be a non-sequitur, and does not contribute to a section that is attempting to promote and encourage soil conservation and management practices."  Recommendation: When soil erosion is a potential threat such that appropriate protection measures are not "cost-effective" to a landowner, then the project in question should be denied a permit until such measures can be implemented.</p>

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95-41	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Objective C-OSRC-8.2: Comment: This Objective is out of date and non-specific. Recommendation: Change to: "Prevent soil erosion and restore areas damaged by erosion by bringing property owners' practices into alignment with the USDA's recommendations: ( <a href="https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs144p2_063808.pdf">https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs144p2_063808.pdf</a> )."
95-42	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-38, 6 TIMBER RESOURCES POLICY, 6.1 BACKGROUND, Timberland Resources: Recommendation: Please make this language more specific, scientific and modern: "Forests are critical for essential ecological functions, such as carbon sequestration, clean air, water conservation, soil health, erosion prevention and habitat for plants, animals and fungi. Forests and woodlands also provide other human-centric benefits such as scenic views and recreation potential."
95-43	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-40, Timberland Environmental Impacts Recommendation: Insert Objective C-OSRC-9.3: "Review new science on optimal forest management for habitat, carbon sequestration and fire prevention. Continuously updated guidelines can be found in Santa Cruz County's forestry management plan and <a href="https://woodlandfishandwildlife.com/wp-content/uploads/2019/12/Wildlife-Friendly-Fuels-Reduction-in-Dry-Forests-of-the-Pacific-Northwest_reduced.pdf">https://woodlandfishandwildlife.com/wp-content/uploads/2019/12/Wildlife-Friendly-Fuels-Reduction-in-Dry-Forests-of-the-Pacific-Northwest_reduced.pdf</a>
95-44	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-41, Mineral Resources Policy Please see SSC's comments and recommendations on this subject in the Land Use Element.
95-45	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-42, Energy Resources Policy, 8.1 Background: Comment: In general, this information is not specific to the coastal zone. It also lacks any modern scientific references. The background section does not discuss the unique situation of coastal communities. Recommendation: Please add: "In addition, coastal communities depend on imported sources of energy, including liquid fuels and electricity. They are vulnerable to energy disruptions from natural hazards such as geological events, storm surges and damage to transportation lifelines. This dependency underscores the importance of supporting enhanced independent energy initiatives in coastal areas."
95-46	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-45, Energy Production and Supply, Policies: Comment: This section does not discuss the current status of renewable and distributed generation applications on the coast. This data are available. There is no mention of the county's community choice agency, Sonoma Clean Power, and its impact on the shift to renewable vs fossil fuel energy supply sources. Policy recommendations encourage the development of renewables in a generic way, but there is no mention of the potential future importance of microgrids, County solar incentive programs such as PACE, etc. Recommendation: Suggest adding the following new policies: "Policy C-OSCR 12d: Encourage the development of microgrids and storage capacity to enhance the energy independence and energy security of coastal communities." "Policy C-OSCR 12e: Encourage and promote County and Sonoma Clean Power programs that provide incentives for the development and use of renewable energy in the residential and commercial sectors."



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95-47	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-46, AIR RESOURCES POLICY, Policy C-OSRC-13c: Comment: This policy transferred from an as-yet uncompleted General Plan is inappropriate for the environmentally-sensitive Coastal Zone. Recommendation: Change to: "No new sources of toxic air contaminants or foul odors shall be permitted."
95-48	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Implementation Programs: Recommendation: Please add a Program to keep the ecological status of the Coastal Zone monitored to avoid on-going resource-extractive activities monitored and controlled: "Initiate ecological monitoring of all recreational or other public uses of undeveloped (open space) areas, to include assessments of human carrying capacity, deleterious impacts associated with human activities (e.g., erosion, soil compaction, loss of or damage to vegetation or wildlife habitat, noise or light pollution) etc. A provision for ecological monitoring and a schedule of assessment and response to ongoing data accrual shall also be required for all extractive agricultural activities, specifically including crop production, wine grape and cannabis production (in case they manage to sneak in against our strongest recommendations!), grazing and livestock rearing and development, timber extraction, road construction, prescription fire (as much as this must be incorporated into regional vegetation management policy or any other activity) – past, current, future – with the potential to render impacts to ecosystem constitution or function."
95-49	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC	Y	Page OSRC-48, 10.2 OTHER INITIATIVES, Other Initiative C-OSRC-2: Comment: This Initiative implies a policy of clear-cutting oaks that appear to be infected with Sudden Oak Death. Recommendation: The California Native Plant Society should be consulted on these Initiatives.
96-1	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC Map Recommendations	Y	ESHA Maps, 1-11, C-OSRC-2-ESHA Map Series: The original map series for ESHAs only recognized steelhead presence in the Russian River, Salmon Creek, and Estero Americano. Identified dependent steelhead populations from Spence et al. (2008) exist also in Kohlmer Creek, Fort Ross Creek, Russian Gulch, Scotty Creek, and tributaries of the Bodega Harbor. SeaGrant is also monitoring returning anadromous fish returns in Green Valley, Dutch Bill and Willow Creeks. Please make any needed corrections in your map files.
96-2	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC Map Recommendations	Y	Maps C-2a - 2k: These maps are at least 13 years old, not recording the acquisition of Jenner Headlands by the Sonoma Land Trust in 2009. For that reason and the acknowledged fact that the maps are not "exhaustive", they cannot be the basis for zoning, policy or enforcement. They should be exhaustive, erring on the side of greater ESHA protection, buffers and potential wildlife retreat, given the rapid loss of biodiversity with the current climate emergency. There is also no recognition or inclusion of coastal prairie, a disappearing habitat, which comprises a much larger proportion of the maps than is shown.
97	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	OSRC	OSRC Recommendations	Y	95-1 to 95-49 are SSC's OSRC recommendations.

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98-1	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	<p>Page PF-5, 3.1 WATER SERVICES:  Comment: "Generally, the coast is a water-scarce area, and land conditions are poor for septic systems. This lack of basic services limits development potential in most areas. The Sea Ranch and Bodega Bay become the main growth areas. Because the coast has a small population spread over large distances, emergency and education services are limited. It is not expected this situation will change substantially in the future." -from the 1981 LCP  Nothing has improved in the way of water supply on the Coast in the past 41 years. To the contrary, with increased tourism and climate change effects on rainfall, the unregulated distribution of underground aquifers is a zero-sum game for all life forms in the Coastal Zone.  Recommendation: Accept the reality of progressively limited water resources. Attempts to extend human reach into the aquifer with more expensive technology and multiple well-drilling sites is a disservice to future generations of coastal life forms, including human.</p>
98-2	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	<p>3.1 Water Services, 3rd paragraph:  Comment: The most recent Municipal Service review of the Bodega Bay District by LAFCO was in 2004.  Recommendation: Updated policy for water needs of any new development should be based on most current data and science and its potential impact on existing water resources and facilities.</p>
98-3	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	<p>Page PF-5, Policy C-PF-2a:  Comment: This policy does not clearly address how growth and development are possible, given the coastal water shortage. It also does not specify where the water will come from or how to determine that adequate capacity is "available and reserved".  Recommendation: Insert "... facilities exist on-site to accommodate.....".  Add: "Outside Service Agreements for wastewater and septic treatment should be the last option and only if all other options for onsite disposal allowed by Public Health and the Basin plan are not feasible."</p>
98-4	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	<p>Policy C-PF-2b:</p>
98-5	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	<p>Page C-PF-6: Policy C-PF-2e:  Comment: These policies differ from the last LCP radically in allowing for development outside of designated urban service boundaries. In our experience, Coastal Development Permits have not been hard to obtain.  Recommendation: Delete Exception (2) altogether, outright.  The current LCP template for development permits should be retained, eg: "Ensure that adequate water capacity is reserved to serve (the first three) priority developments (listed below as they are proposed in the Phase I development plan for Bodega Bay,) by requiring that if water supplies do not prove adequate to all land uses designated in the Phase I plan, a minimum of 30 percent of the projected available amount shall be reserved for the designated priority uses.  Maintain the 2001 LCP's limitation of new public water and wastewater systems to within designated urban services boundaries. In cases in which several septic systems fail in a cluster, rather than extending sewer services outside urban boundaries, an invitation to sprawling development, require onsite wastewater treatment systems.</p>

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98-6	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	Page PF-7, Policy C-PF-2f: Comment: This policy further acknowledges that there will be discretionary development allowed outside Urban Service Areas. Recommendation: Reduce the distance for the connection to public sewage to no more than 100 feet. Change the word "limit" to the word "prevent".
98-7	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	Policy C-PF-2g: Comment: It is clear that under these exception policies, a private property recreational concession could access urban services by declaring the development "public". Recommendation: Delete (2).
98-8	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	Policy C-PF-2h: Comment: No Comment.....
98-9	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	Policy C-PF-2i: Comment: This policy clearly indicates that subdivision and development are being welcomed in the Coastal Zone. Recommendation: Drop "or that the service provider will make improvements to the water or wastewater systems necessary to accommodate the new development and uses prior."
98-10	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	Page PF-8, Policy C-PF-2l: Comment: The words "or other projects" are undefined and leave a loophole for development other than that of affordable housing. Recommendation: Change the first sentence to: "New privately owned package treatment plants which serve multiple uses or serve separate parcels shall be limited to the service of affordable housing only."
98-11	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	Policy C-PF-2p: Comment: Per Peter Benham's comments on Land Use categories, reminding us of priorities as stated in the Half Moon Bay LCP: "3. Priority Land Uses. Define priority land uses and support development of such land uses throughout the City by the following categories: a. Coastal Act Priority Uses: Coastal-dependent uses, agricultural uses, visitorserving commercial uses, and coastal access and recreational facilities. Coastal Act Priority Uses are considered top tier priority in this LCP; and furthermore, as consistent with Coastal Act Section 30222, coastaldependent industry and agriculture take precedence over all other uses including visitor serving uses."
98-12	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Service Recommendations	Y	Page PF-24, 11.2 OTHER INITIATIVES, Other Initiative C-PF-1: Recommendation: Utilize CDWR and County Water Board guidance in formulating any aquifer estimates and long-term sustainability of local water supplies.
99-1	2/16/20	Charter, Richard	The Ocean Foundation	6947 Cliff Avenue, Bodega Bay	waterway@monitor.net	Land Use	Biotic Protections	Y	The Caltrans Highway One realignment which includes an elevated ten foot wide bridge crossing Scotty Creek would cause unnecessary intrusion on the habitat. The site needs careful design review as to not impact the watershed in a detrimental way.

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99-2	2/16/20	Charter, Richard	The Ocean Foundation	6948 Cliff Avenue, Bodega Bay	waterway@monitor.net	Land Use	Biotic Protections	Y	In 2019 there was a federal Five-Year OCS offshore drilling plan. The plan is currently on hold, but after 2020 it is expected to advance rapidly. A ballot measure protecting the Sonoma Coast was adopted in 1986. A broader interpretation of the onshore facilities language should be undertaken in the LCP Update to protect lands along our coast that would otherwise be vulnerable to subsea cable landfalls, new onshore electrical switchyards and distribution substations, and onshore staging areas for the offshore floating wind industry now being planned in federal waters lying off of counties to our north.
99-3	2/16/20	Charter, Richard	The Ocean Foundation	6949 Cliff Avenue, Bodega Bay	waterway@monitor.net	Land Use	Public Access	Y	The LCP should take these MPA's into account in terms of shoreside land use planning. The LCP Update needs to also incorporate consideration of the elements of the California Coastal National Monument that lie along the Sonoma Coast, including the appropriateness of proposed shoreline public access points for that National Monument along our coast.
99-4	2/16/20	Charter, Richard	The Ocean Foundation	6950 Cliff Avenue, Bodega Bay	waterway@monitor.net	Land Use	Vacation Rentals	Y	Vacation Rentals can negatively impact public safety because of differing morals or values. a) Limit the total number of vacation rentals at the coast. b) Provide a community with the option of becoming an exclusion zone free of vacation rentals. c) Maximum occupancy rates not to exceed two persons per bedroom, plus an additional two persons. d) 24-hour management must be available. e) Each vacation rental location must demonstrate that it has adequate onsite parking on its own parcel, reliable garbage service, and noise must be controlled during quiet hours. f) The "three strikes" principle utilized elsewhere in Sonoma County must be applied at the coast, i.e.; three verified violations at one property should lead to a one-year hiatus in vacation rental uses at that site.
99-5	2/16/20	Charter, Richard	The Ocean Foundation	6951 Cliff Avenue, Bodega Bay	waterway@monitor.net	Land Use	Prinipally Permitted Use	Y	The consistent administrative treatment of all Coastal Permit applicants, without the present practice of granting of biased access gained through retaining expensive consultants who are sometimes former County staff, must particularly apply to inappropriate proposals for rural commercial event centers in agricultural settings and to all other threats to conservation lands, safe communities, and open space protection.
99-6	2/16/20	Charter, Richard	The Ocean Foundation	6952 Cliff Avenue, Bodega Bay	waterway@monitor.net	Land Use	General Plan Consistency	Y	In the context of the LCP Update, General Plan 2020 is not arbitrarily transposable to the Sonoma Coast. Transmigration of some of the more concerning aspects of the Countywide General Plan into the LCP should not take place now, nor should it be enabled in the undefined future. Our coast is a unique and irreplaceable asset and deserves the kind of profound respect and due care that it was accorded during the thorough public process by which the first Sonoma County LCP was initially formulated and adopted.
99-7	2/16/20	Charter, Richard	The Ocean Foundation	6953 Cliff Avenue, Bodega Bay	waterway@monitor.net	Land Use	Housing	Y	The LCP draft opens the door to random conversion of commercial fishing-related residential opportunities into what the General Plan calls "affordable housing", which would not longer, as we interpret the preset public view version of the document, need to be prioritized for fishing families as before.

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99-8	2/16/20	Charter, Richard	The Ocean Foundation	6954 Cliff Avenue, Bodega Bay	waterway@monitor.net	Land Use	Biotic Protections	Y	On rodenticides: Compounds that already have been precluded from retail sale in the State of California should not be used within the Coastal Zone of Sonoma County. In this regard, Malibu has recently adopted language in their own LCP that should be customized for adoption in the Sonoma County LCP. Neighboring Marin County has a well-established Integrated Pest Management Plan, parts of which can serve us as a ready model in Sonoma County.
99-9	2/16/20	Charter, Richard	The Ocean Foundation	6955 Cliff Avenue, Bodega Bay	waterway@monitor.net	Land Use	OSRC	Y	The County of Sonoma needs to stop consenting to CalFire's free reign over review and approval of proposed Timber Harvest Plans (THP's), particularly in the Coastal Zone. The County should also be the final arbiter of vineyard conversions of forestland, as well as standing as the primary responsible steward in protecting our hypersensitive riverine floodplain habitats.
99-10	2/16/20	Charter, Richard	The Ocean Foundation	6956 Cliff Avenue, Bodega Bay	waterway@monitor.net	Land Use	Historic Preservation	Y	More of our coast's smaller coastal residential communities should be treated as historic preservation districts in which incompatible or intrusive structures are discouraged, and as places where appropriately-scaled buildings of compatible design should be prioritized. Otherwise, we will continue to incrementally lose the character of our coastal communities, one street and one building at a time.
99-11	2/16/20	Charter, Richard	The Ocean Foundation	6957 Cliff Avenue, Bodega Bay	waterway@monitor.net	Circulation and Transit	Transportation	Y	The updated LCP should pay more attention to exploring appropriately-sited left-turn lanes, intelligent traffic and visitor parking management, and alternative transportation modes, lest clogged rural transportation routes that were originally designed to accommodate horsedrawn wagons unsurprisingly come to a halt on many busy holiday weekends. While we all love bicycles and support their use for healthy coastal access, planning policies that can eventually relocate the increase in bicycle traffic off of our narrow, shoulder-free, Coast Highway One wherever possible, in the interest of both bicycle and vehicular public safety, should be a higher priority in the LCP Update
99-12	2/16/20	Charter, Richard	The Ocean Foundation	6958 Cliff Avenue, Bodega Bay	waterway@monitor.net	OSRC	Public Access	Y	In summary, the current update of the LCP should continue to integrate the input of coastal communities, organizations, and local citizens into the review and revision process in order to produce a comprehensive Local Coastal Plan Update that truly protects our coast and one that works in the best interests of the people and places of Sonoma County and their global constituency.
100	01/08/2007	California Coastal Commission	California Coastal Commission	1000 Point San Pedro Road	N/A	Land Use	Biotic Protections	N	Letter from the CCC to Bill Dutra regarding quarry expansion project. Reemphasizes earlier stance-- the adverse impacts to the habitat and basically all other elements make this project something that will never be approved. The project is something that is not approval consistent with California coastal resource protection policies.
101-1	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationale: When the 2019 Noise Element was deleted from the 2021 draft, important information regarding the effects of noise on people and accompanying policy was deleted. This should be recovered. Effects of "anthropogenic" (man-made) noise on people themselves is unaddressed in the 2021 Draft LCP. Recommendation: Re-instate the 2019 LCP Draft Noise Element in the LCP Draft.

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101-2	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationale: According to Arthur Popper, PhD, editor of Acoustics Today, this is one of the most science-based and user-friendly community noise policies in the United States. Recommendation: review and incorporate the model noise ordinance applying to Montgomery County, Maryland ( <a href="https://www.montgomerycountymd.gov/DEP/contact/noise.html">https://www.montgomerycountymd.gov/DEP/contact/noise.html</a> ).
101-3	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationale: There has been much research done worldwide in the rapidly emerging field of human-caused noise and vibration effects on animals. Because the LCP will determine coastal policy for the next 20 years, we request that Permit Sonoma staff with wildlife ecology training and experience review the text and journal mentioned above on an annual basis. New science relevant to sound and vibration effects on terrestrial and marine wildlife may then inform them of any necessary amendments to the LCP Noise Policy. Recommendation: Permit Sonoma staff with wildlife and ecology training and experience review "Effects of Anthropogenic Noise on Animals", a 2018 co-publication of Springer and the Acoustical Society of America, and the international journal "Acoustics Today" annually.
101-4	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Recommendation: Under section 1.3 in the Noise Element, include "ESHAs" as noise-sensitive areas (rather than as a "use").
101-5	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Recommendation: Under section 2.2.1, add "(6) Construction" and "(7) Manned and Unmanned Aircraft (Drones)".
101-6	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Recommendation: Add Section 2.3 to the Noise Element: "Noise and Its Effects on Animals and Habitat". We suggest paraphrasing "Why Sounds Matter", from the Point Reyes National Seashore website ( <a href="https://www.nps.gov/subjects/sound/soundsmatter.htm">https://www.nps.gov/subjects/sound/soundsmatter.htm</a> ) as both rationale and introduction: "Natural sounds are part of the resources vital to coastal ecosystems. Such sounds comprise communication critical for wildlife in natural habitats, an immersive experience for visitors and a peaceful environment for residents. Animals depend on hearing natural sounds in the environment for a range of activities, including: <ul style="list-style-type: none"> <li>• Communication</li> <li>• Establishing territories</li> <li>• Finding habitat</li> <li>• Courting and mating</li> <li>• Raising families</li> <li>• Finding food and avoiding predators</li> <li>• Protecting their young"</li> </ul>
101-7	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationale: Scientific evidence has demonstrated a clear pattern of potential harm to every species of marine or terrestrial animal by excessive noise. Recommendation: Add to GOAL C-NE-1: "Protect people, animals, environmentally sensitive habitat, and land uses from the adverse effects of exposure to excessive noise...."

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101-8	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationales: Wildlife and habitat require similar protection as people do from the potential deleterious effects of noise and vibration : <a href="https://www.researchgate.net/profile/Rouven-Schmidt/publication/337401780_The_effects_of_anthropogenic_noise_on_animals_a_meta-analysis/links/5ddaaec4458515dc2f4b699a/The-effects-ofanthropogenic-noise-on-animals-a-meta-analysis.pdf?origin=publication_detail">https://www.researchgate.net/profile/Rouven-Schmidt/publication/337401780_The_effects_of_anthropogenic_noise_on_animals_a_meta-analysis/links/5ddaaec4458515dc2f4b699a/The-effects-ofanthropogenic-noise-on-animals-a-meta-analysis.pdf?origin=publication_detail</a> Recommendation: Add "Objective C-NE-1.5: "Protect the unique sound environment of the rural coastal zone to sustain a healthy coastal ecosystem and quality human experience there for future generations."
101-9	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationale: During direct communication with Arthur Popper, PhD, editor of Acoustics Today on November 2, 2021, we learned that the shifting research and technological environment with regard to noise and vibration effects on wildlife requires utilization of the Precautionary Principle rather than premature statements of policy. The article above was also recommended as a reference by Dr. Popper. Recommendation: In place of Policy, Objective C-NE-1.5 continues: "In temporary lieu of research-based, specific, protective Policy with a to effects of noise and vibration on multiple species of wildlife, the Precautionary Principle will be followed:" "The precautionary principle in modern environmental science is the guideline for environmental decision making and has four central components: taking preventive action in the face of uncertainty; shifting the burden of proof to the proponents of an activity; exploring a wide range of alternatives to possibly harmful actions; and increasing public participation in decision making ( <a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1240435/">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1240435/</a> )." Include as reference, "Soundscape Ecology of the Anthropocene", by Hans Slabbekoorn, PhD, from "Acoustics Today" Spring, 2018 ( <a href="https://acousticstoday.org/soundscape-ecology-anthropocene/">https://acousticstoday.org/soundscape-ecology-anthropocene/</a> ).
101-10	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationale: This is current Greater Farallones Marine Sanctuary regulation for our coastline. Recommendation: Add "Policy C-NE-2f: Overflight altitudes shall be no lower than 1000 ft elevation over the coastal zone."
101-11	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationale: This is current Sonoma Coast State Parks regulation, which governs similar and adjoining habitat to rural and open space areas of the coastal zone. Recommendation: Add "Policy C-NE-2g: Unmanned aircraft (drones) shall not be flown over ESHAs."
101-12	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationale: Objectives 1.1 and 1.2 are duplicate. Recommendation: Change in "The following policies shall be used to achieve these objectives:" to "The following policies shall be used to achieve objectives C-NE-1.1 through C-NE-1.3."
101-13	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationale: This policy assumes permitting of races or concerts 6 days per year with attendant increased noise allowances. This would be fitting for the General Plan but not the Coastal Zone. Delete Policy C-NE-1c(4)

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101-14	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Noise	Noise Element	Y	Rationale: This Policy recommends treatment of open space as a noise buffer. This would be fitting for the General Plan but not the Coastal Zone. Delete Policy C-NE-1c (5)(b)
102-1	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	The population projection on page 3 of the 2019 Draft, all the public has been given access to, is excessive and drives much of the development language in this Element. It should be lowered, as should be the development emphasis. ("The amount of land shall be consistent with the population projected.....". There is a major discrepancy between the population increase projected by the "General Plan for the Sonoma Coast", which is itself an inappropriate application, of "11,700 new residents by 2020" and the total population of 3,359 projected by Permit Sonoma GIS Community Profile for 2023);
102-2	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	Inappropriate conversions, amendments and inordinate discretionary powers by Permit Sonoma have lead to development out of keeping with directives by the California Coastal Commission. Applications for Local Coastal Plan Amendments have been approved by Permit Sonoma, correlated to financial incentives accrued by the department under the provision of "At Cost" assistance by planners to wealthy developers. This historically leads to both falsification of information given to the Commission, resulting in "de minimus" designation, or project approval against Coastal Commission directives. The built-in incentive to abet development along with Permit Sonoma discretionary power should be abolished for the sake of defined Coastal Zone resource conservation. Additionally, applications should be publicized as they are filed, along with disclosure of all communications and billings between developers and PS staff with real-time participation by the public and the CCC.
102-3	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	The Land Use maps are very old (20-25 years) and are no longer accurate;
102-4	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	New development, including land divisions, for a non-priority use is already anticipated, as is evidenced by Appendix A. Discretionary new development should be prohibited, whether or not there is theoretical water and wastewater capacity for it, let alone providing additional water (Policy C-LU-4c). As the effects of climate change escalate, so does the need for groundwater and biotic conservation and prevention of erosion and groundwater contamination. Emergency services and roadway transportation are already inadequate to serve the needs of coastal residents and visitors.
102-5	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	Bodega Bay has insufficient water for high-density housing and should not be subject to more well-drilling in a known zone of extremely scarce groundwater ("Adequate water, sewer, public safety, park, school services, and other necessary infrastructure are available or planned to be available.") This language is an open door for inappropriate development approval.



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102-6	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	There should be early (eg, prior to full application) MAC, general public and Coastal Commission notification and public vote on any developments proposed within areas of Principally Permitted Use;
102-7	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	Under the broad definition of "resource-dependent", even an activity as destructive as aggregate mining could theoretically be approved in ESHA. Clearing of vegetation, grading, excavation, fill or construction, even for resource-dependent uses, should be prohibited in ESHA;
102-8	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	Development of Planned Communities in the Coastal Zone with tennis courts and golf courses is untenable for multiple reasons (eg, inadequate water supply, impacts on wildlife, viewscape, erosion, etc) and should be prohibited from the coastal zone entirely;
102-9	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	Onshore support facilities for any form of offshore energy generation, such as wind and wave, in addition to offshore oil or gas exploration and development, should be prohibited in the coastal zone.
102-10	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	There are no over-arching guidelines limiting urban or commercial service area boundaries. Zoning constraints to determine boundaries must be provided to avoid inappropriate use permits.
102-11	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	Preserve and enhance affordable housing opportunities on the Sonoma County coast by enforcing a moratorium on vacation rentals until such time that no more than 20% of housing is for vacation rental use. (Santa Cruz LCP language, approved by the Coastal Commission).
102-12	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	Regulate vacation rentals specifically: One off-street parking spot per bedroom and 2 cars maximum per bedroom in vacation rental properties shall be required in residential areas to reduce traffic congestion and GHG (Trinidad LCP), unless neighborhood covenant rules have stricter parking rules in which case those parking regulations apply; a sign of not more than 3 by 3 feet shall be required on vacation units with phone number and contact information for complaints (Santa Cruz LCP); to support climate change impacts associated with tourism and affordability for residents/workforce, minimum rental shall be for 7 days. (Solano Beach has 7 days, Imperial County has a 30 day minimum for vacation rentals). All vacation rentals shall be licensed and regulations enforceable by means of fines (California Senate Bill 1049 allows cities to fine rental hosts up to \$5000 per violation.) Property owners/management that have repeated violations shall have their license revoked for not less than one year.
102-13	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Land Use	Development	Y	Require that "affordable housing" be reserved and maintained at low cost for occupancy by commercial visitor service workers who heretofore have been required to commute long distances to work. The suggested Housing Opportunity Area south of old town Bodega Bay refers to land developed illegally by RJ Battaglia for expensive vacation rentals, not truly affordable housing. Further permits with for this individual's projects should be curtailed.

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103-1	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Public Access	Y	Policy C-PF-2d: -is incomplete and confusingly written
103-2	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Public Access	Y	Page 7, Policy C-PF-2g: “Public park and recreational facilities” are not defined. There is concern that private landowners could access public services for privately developed recreational concessions open to the public. Terms should be clearly defined here or in the Glossary to avoid that possibility,
103-3	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Public Access	Y	Page 9, Policy C-PF-2p: for example: -Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development in accordance with California Coastal Act Sections 30222 and 30254. The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority consistent with coastal priority land uses of the Coastal Act. (NEW)
103-4	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Public Access	Y	Pages 9 and 10: -Further Park and Recreation Facility Development are being encouraged and planned. Anticipated tourism and recreational growth puts the cart before the horse. These goals, objectives and policies are in support of a mistaken premise—that the Sonoma County Coastal Zone has an unlimited capacity for recreational development. It does not. Its unique qualities are already being degraded by recreation and tourism in excess of its public safety, transportation, facilities and services carrying capacity. Rather than increasing development to meet population growth and demand, it is time to safely steward coastal resources and more carefully manage the amount of recreational use we already have (eg, many pounds of garbage and even human feces were left on Doran Beach in the aftermath of the 2018 4th of July fireworks event, per Patty Ginocchio).
103-5	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Public Access	Y	Page 15: Policy C-PF-5d: -Inadequate fire and emergency services in the coastal zone are still not clearly addressed: “Support actions, including consolidation of fire districts and increased tax revenue that will provide sustainable fire protection and emergency medical services. Identify funding opportunities that will require visitor serving uses to provide support.” -Sonoma County Coastal zone tourism generates more TOTs than any other region in the County but the revenue is not returned commensurate with the need for basic public safety services.
103-6	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Public Access	Y	Page 18, Policy C-PF-7: -Application of biosolids policy must include US EPA listed criteria, eg: “Sufficient land to provide areas of non-application (buffers) around surface water bodies, wells, and wetlands; Depth from the soil surface to groundwater equal to at least one meter; Soil pH in the range of 5.5 to 7.5 to minimize metal leaching and maximize crop growing conditions;”etc.
103-7	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Public Access	Y	No solid waste facility should be visible or smelled in the Coastal Zone.

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103-8	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Public Access	Y	<p>Page 19, Policy C-PF-2a, p 19:            -To close potential loopholes for leap-frogging new development, as in: "Development, including land divisions, shall be prohibited unless adequate water and wastewater treatment and disposal capacities and facilities exist to accommodate such development.", we recommend inserting the words "on-site" between "unless" and "adequate".            -And to prevent a proliferation of Outside Service Agreements, we further recommend adding language that "OSAs should be the last option and only if all other options for onsite disposal allowed by Public Health and the Basin plan are not feasible."</p>
103-9	1/13/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Facilities	Public Access	Y	<p>Page 24, Other Initiative C-PF-1:            -The pervasive water shortage in the coastal zone should be noted and integrated into policy regarding any future development. The most recent Municipal Service review of the Bodega Bay District by LAFCO was in 2004: "Updated policy for water needs of any new development should be based on most current data and science and the impact on existing water resources and facilities." .....and should include this language: "Utilize CDWR and County Water Board guidance in formulating any aquifer estimates and long-term sustainability of local water supplies."</p>
104-1	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	<p>1.1 2nd paragraph: The current traffic congestion [on] ALONG the coast has resulted from a combination of factors. Regional factors include growth in employment and population [primarily within Sonoma County's cities]. Local factors include increases in parkland ATTRACTIONS [acreage through expansions, acquisitions, and dedications]; in the number and length of trails and associated hiking opportunities; in access to the beach and ocean; and lack of public transportation. [Most importantly,] The public HAS FEW ALTERNATIVES TO [continues to prefer] the automobile as the primary means of transportation.</p>
104-2	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	<p>2.1.1 3rd paragraph: Sonoma Coast State Park and Sonoma County public beaches are among the most visited parks northwestern California, generating significant weekend traffic congestion. With limited public transportation and lack of safe bicycle routes, most people HAVE BEEN [are] obligated to drive in order to enjoy the Sonoma Coast.</p>

Comment #	Comment Date	Name	Organization	Address	Email	LCP Section	Category	Multiple	Summary
104-3	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Roadway Capacity and Conditions: DUE TO THE [With] narrow shoulders, LIMITED [inadequate] sight lines, and limited opportunity for safe passing, improving THE ADHERENCE TO SAFE SPEED LIMITS [road safety] is the primary concern along the entire length of Highway 1.
104-4	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Transportation Improvements, 1st paragraph: MORE THAN THREE DECADES HAVE PASSED SINCE THE [In the 1985] California Department of Transportation (Caltrans) Route Concept Report Summary on State Highway 1, RECOMMENDED ROADWAY IMPROVEMENTS, BUT ONLY A FEW HAVE BEEN FUNDED AND BUILT. [Caltrans identifies the following potential roadway safety improvement projects: shoulder widening, passing lanes, channelization and intersection improvements to enhance turning movements, additional parking areas where unsafe parking conditions currently exist, and features that would minimize roadside parking on the highway. Safety improvements to State Highway 1 constructed since the last Local Coastal Plan Update in 1995 include left turn lanes at The Sea Ranch, at the intersection with State Highway 116 near Jenner, near The Tides restaurant, and at the Bodega Harbour Subdivision. Other improvements include stabilization projects north of Jenner, guardrails along the Russian River estuary, and the ongoing project to relocate Highway 1 along Gleason Beach.] IT IS UNCERTAIN THAT THIS SCENIC ROUTE WILL BE A HIGH PRIORITY FOR MANY ADDITIONAL PROJECTS.

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104-5	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	1st paragraph: SHOULD FUNDING BECOME AVAILABLE, providing turning lanes at intersections and parking areas is the most effective approach to improving the SAFETY [capacity] of State Highway 1 while maintaining it as a two lane scenic highway. Addition of turning lanes provides considerable safety benefits as well as reducing traffic delays in Jenner, Bodega Bay , and near public beaches.
104-6	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	1st paragraph: Minor road improvements in the community of Bodega Bay will not relieve traffic congestion, and establishing a bypass route has proven infeasible. While capacity along this section of State Highway 1 will remain LIMITED, [inadequate,] there are MANY opportunities to improve [pedestrian] safety and reduce dependency on automobiles for [local] trips OF LESS THAN 3 MILES by adding pedestrian walkways, INTRODUCING SHARED ELECTRIC BICYCLE OPPORTUNITIES, restricting turning movements across traffic, and reducing vehicle speeds.
104-7	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	2nd paragraph: Reducing speed limits is the most practical way to <del>SHOULD FUNDING BECOME AVAILABLE, providing turning lanes at intersections and parking areas is the most effective approach</del> improve the SAFETY capacity of State Highway 1 while maintaining it as a two lane scenic highway . Addition of turning lanes might provides considerable safety benefits as well as reducing traffic delays in Jenner, Bodega Bay, and near public beaches.

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104-8	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	<p>3rd paragraph:Other safety improvements THAT HAVE BEEN proposed for State Highway 1 are SIGNAGE TO ALERT MOTORISTS TO PEDESTRIANS AND CYCLISTS, selective widening and road alignments; parking management, development and enforcement programs; [and other types of road improvements such as] roadway striping and marking, bicycle lanes and pedestrian ways.</p> <p>Improvements to State Highway 1 such as construction of bicycle paths or widening of shoulders will be necessary to construct the Sonoma County segment of the California Coastal Trail (see discussion below).</p>

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104-9	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	<p>5th paragraph: Minor road improvements in the community of Bodega Bay will not relieve traffic congestion, and establishing a bypass route has proven infeasible. While capacity along this section of State Highway 1 will remain LIMITED, [inadequate,] there are MANY opportunities to improve [pedestrian] safety and reduce dependency on automobiles for [local] trips OF LESS THAN 3 MILES by adding pedestrian walkways, INTRODUCING SHARED ELECTRIC BICYCLE OPPORTUNITIES, restricting turning movements across traffic, and reducing vehicle speeds. AT PRESENT, MINIMAL public transit is provided by Mendocino Transit Authority and Sonoma County Transit. Mendocino Transit Authority operates bus route 95, which is the only year-round transit service along the Sonoma Coast. Service is CURRENTLY limited to a single daily trip running southbound to Santa Rosa in the morning and returning in the afternoon. This route provides a limited opportunity for coastal residents working in Sebastopol and Santa Rosa, but does not provide ADEQUATE [good] service for workers OR VISITORS. [living in the coastal area that need to commute to jobs in the inland areas of Sonoma County.] PROCEEDS OF A PARKING PASS RESERVATION PROGRAM FOR VISITORS SHOULD MIGHT BE CONSIDERED AS A MEANS OF REDUCING CONGESTION AND BY HELPING TO FUND FUNDING ADEQUATE PUBLIC TRANSPORTATION.</p>
104-10	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	<p>3. Circulation and Transit System Policy: 3.1 General Transportation Policies Goal C-CT-1: It is critical to reduce dependence on automobiles, both to maintain the scenic qualities of Highway 1, and to improve safety for cyclists and pedestrians.</p>

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104-11	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Objective C-CT-1.1: It would be better to statethat: "The most likely way to initiate basic funding for much-needed public transit and shuttle services would be to establish an equitable public and private parking reservation systemfor the vicinity of Jenner, taking lessons fromthe parking reservation systemand private and public shuttles that now serve Muir Woods. <a href="https://MarinTransit.org/sites/default/files/inlinefiles/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf">https://MarinTransit.org/sites/default/files/inlinefiles/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf</a> Such a system could be developed for destination parking areas that fill up most quickly on high-visitor days. An experienced public or private entity witha diverse advisory board representing public and private entities that own parking spaces, as well as visitors, residents, and employees of coastal entities, could administer such a system.
104-12	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	"Because the cost of needed improvements to the circulation and transit systemare likely to range f rom \$10 million to \$30 million per y ear, launch projects that will increasingly attract Federal and Stategrants to supplement local fees, taxes, and bonds."



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104-13	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	<p>It would be better to statethat: " The most likely way to initiate basic funding for much-needed public transit and shuttle services would be to establish an equitable public and private parking reservation systemfor the vicinity of Jenner, taking lessons from the parking reservation system and private and public shuttles that now serve MuirWoods. <a href="https://marintransit.org/sites/default/files/inlinefiles/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf">https://marintransit.org/sites/default/files/inlinefiles/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf</a> Such a systemcould be developed for destination parking areas that fill up most quickly on highvisitor days. An experienced public or private entity with a diverse advisory board representing public and private entities that own parking spaces, as well as visitors, residents, and employees of coastal entities, could administer such a system.</p>
104-14	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	<p>Objective C-CT-1.2: There are limits to expansion of the road network and parking areas can not reasonably be expanded to support rising numbers of automobiles visitors. Theref ore, it is important to: . . . (see change) Dev elop a convenient and reliable sy stem of public and private buses, shuttles, TNC services, vans, bikeshare services, and pathways that will make it practical and attractivefor increasing numbers of visitors to park automobiles at inland locations.</p>
104-15	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	<p>Objective C-CT-1.3: Because the Air Resources Board Staff has predicted that California's vehicle miles traveled must be reduced by 25% by — reductions at the rate of about 1%per year in vehicle miles traveled are most likely to be required for the Local Coastal Zone. The objective must be: "Steadily reduce vehicle miles trav eled as well as greenhouse gas emissions to comply with Stateand regional requirements."</p>

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104-16	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	<p>Objective C-CT-3 cont.: Because the Governor's Office of Planning and Research has recognized that California's vehicle miles traveled per capita must be reduced, declines at the rate of about 1%per year are likely to be required for the County and the Local Coastal Zone should assume a similar requirement. Calif. Office of Planning &amp; Research, Technical Advisory on Evaluating Transportation impacts in CEQA, Dec. 2018, p.2: . . . to achieve the State's long-termclimate goals, California needs to reduce per capita VMT. This can occur under CEQA through VMT mitigation. Half of California's GHG emissions come fromthe transportation sector 3 , therefore, reducing VMT is an effective climate strategy, which can also result in co-benefits. 4 Furthermore, without early VMT mitigation, the state may follow a path that meets GHG targets in the early years, but finds itself poorly positioned to meet more stringent targets later. For example, in absence of VMT analysis and mitigation in CEQA, lead agencies might rely upon verifiable offsets for GHG mitigation, ignoring the longerterm climate change impacts resulting fromland use development and infrastructure investment decisions. As stated in CARB' s 2017 Scoping Plan: <a href="https://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf">https://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf</a></p>

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104-17	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Objective C-CT-1.3 cont: SB 375 and the Air Resources Board call for California's vehicle miles traveled to per capita must be reduced, by about 25% at the rate of about 1%to 3%per year in order to achieve carbon neutrality by the year 2050. Plans for are likely to be required for the County and theLocal Coastal Zone will should assume a similar requirement be consistent with this trend.
104-18	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Object C-CT-1.5: Since automobile travel is sensitive to pricing and the attractiveness of alternatives such as cycling and walking, the emphasis should be to: "Reduce the use of automobiles by the workforce through a jobs/housing balance of approximately 1.5 jobs within walking and cycling distance of each year-round residence, and by assuring access to a safe network of bicycle-pedestrian pathways."
104-19	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Objective C-CT-1.6: Within the Coastal area, the objective should be to "Encourage projects that are designed to encourage active transportation, such as the use of pathways, bicycles, vans and shuttles."
104-20	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-1b:Because the best way to reduce driving is to make drivers aware of the costs, this policy should be to: Require all new developments and all significant improvements to existing developments to unbundle parking costs so that users who bicycle, walk, or use transit are not required to pay for parking.
104-21	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Goal C-CT-2: Because State law as well as regional policies require vehicle miles traveled to be steadily reduced, this goal should state: "Decrease vehicle miles traveled by approximately 1% per year, and provide for increasingly attractive alternative means of travel to and within the Coastal Zone."
104-22	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Where is C-CT-2.6?

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104-23	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Objective C-CT-2.10: Because some roads are currently unsafe for cyclists and pedestrians at present, this objective should read: Assure that all roads have speed limits consistent with safe use by cyclists, pedestrians and drivers, considering the design and condition of existing shoulders, paths, roadways, and bike lanes.
104-24	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-2c: It would more clear to say: On transit routes, provide turnouts for bus operations.
104-25	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-2d: THE BICYCLE COALITION SHOULD LOOK AT THE BIKEPED SECTIONS. The national highway entities that are autooriented have specifications for bicycle elements of road projects that are not optimal (or safe) for bicycles. IN BICYCLE & PEDESTRIAN FACILITIES, INCLUDE DEFINITION OF CLASS IV BIKEWAYS. Require development projects to UNBUNDLE THE COST OF PARKING, AND WHEREVER FEASIBLE TO implement measures that increase the average occupancy of vehicles, such as: (GP2020 Revised) INCLUDE DEFINITION OF CLASS IV BIKEWAYS
104-26	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy CT-3j: This could create some problems.
104-27	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Objective C-CT-4e: REDUCE VEHICLE MILES TRAVELED IN ORDER TO Maintain an LOS C or better on roadway segments unless a lower LOS has been adopted.
104-28	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-4e(2): IMPLEMENT MEASURES TO REDUCE VEHICLE MILES TRAVELED ON [Designate and design] Rural Principal and Minor Arterial Roads [as highway routes] that carry large volumes of intercity traffic [and that place priority on the flow of traffic rather than on access to property. The following policies apply to Urban and Rural Arterials]: DELETE
104-29	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-4e (3): DELETE

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104-30	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-4e (4): DELETE
104-31	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-4j: AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, consider intersection management improvements at key intersections throughout the coast as needed to address intersection congestion and long delays for turning movements. These may include installation of traffic signals, signal timing, re-striping, lengthening, turn lane additions, or other improvements, provided the improvements are consistent with the applicable road classifications and protection of coastal resources. (GP2020/Existing LCP)
104-32	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-4k: Construct improvements such as realignment, signalization, roundabouts, turn restrictions, [oneway streets,] and traffic calming at the following intersections to improve safety at the following intersections: (GP2020/Existing LCP revised)
104-33	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-4m: AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, Consider constructing the following sets of road improvements to increase the capacity and safety of State Highway 1 in Jenner:
104-34	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-4n: AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, Consider providing turn lanes at The Sea Ranch intersections listed below. An intersection improvement of lower priority could be constructed before an intersection improvement of higher priority if funding is available.
104-35	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-4q: AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, consider Implementing the following [capacity and] safety improvements along State Route 1:

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104-36	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-4s: While providing for REDUCTIONS IN VEHICLE MILES TRAVELED [capacity] and safety improvements, ensure that State Route 1 shall remain a scenic two-lane highway within rural areas. (New)
104-37	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Goal C-CT-5: Integrate the funding and development of planned circulation and transit system improvements with countywide transportation planning efforts, REDUCTIONS IN VEHICLE MILES TRAVELED, and land use planning and development approval. (GP2020)
104-38	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Objective C-CT-5.3: Maintain acceptable Levels of Service as set forth in this Element by REDUCING VEHICLE MILES TRAVELED [implementing funding strategies for planned improvements].
104-39	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-5a: Review and condition development projects to assure that the REDUCTIONS IN VEHICLE MILES TRAVELED [LOS] and/or public safety objectives established in Policies C-CT-4a and C-CT-4b are being met. If the proposed project would result in INCREASED VEHICLE MILES TRAVELED [an LOS worse than these objectives], consider denial of the project. [unless one or more of the following circumstances exists:
104-40	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-5a (1): DELETE
104-41	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-5a(2): DELETE
104-42	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-5a(3): DELETE

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104-43	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Policy C-CT-5b: Require that new development REDUCE VEHICLE MILES TRAVELED, AND [provideproject area improvements necessary to] accommodate vehicle and transit movement in the vicinity of the project, including [capacity improvements,] traffic calming, rightof-way acquisition, access to the applicable roadway, safety improvements, and other mitigation measures necessary to accommodate the development without inhibiting public access. (GP2020 Revised)
104-44	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Program C-CT-1(2): Assesses REDUCTIONS IN VEHICLE MILES TRAVELED [the level of service (LOS)] and how well planned improvements are IMPROVING ACTIVE TRANSPORTATION OPTIONS TO KEEP [keeping] pace with Countywide growth and development
104-45	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Program C-CT-1(6): Is capable of modeling weekend and off-peak travel demand in order to MINIMIZE VEHICLE MILES TRAVELED DUE TO [plan for] tourism and special events[traffic].
104-46	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Change last paragraph: Consider the use of moratoria or other growth management measures in areas where the monitoring program shows that the LOS objectives are not being met due to POTENTIAL INCREASES IN VEHICLE MILES TRAVELED[lack of improvements]. (GP2020)
104-47	3/23/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Circulation and Transit	Transportation	Y	Program C-CT-2: Monitor traffic volumes on County maintained road segments, and ADJUST PARKING PERMIT CHARGES TO PREVENT [work with Caltrans on similar State Highway 1 segments that are projected to experience] unacceptable Levels of Service during peak weekend periods, particularly in the summer and fall months. Assemble these data for use in future assessment of THE PARKING PERMIT SYSTEM TO IMPROVE [development project impacts on] weekend traffic patterns. (GP2020)

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105	7/19/21	Scheinok, Tamir	N/A	41557 Hathway Ct, The Sea Ranch	tscheinok@gmail.com	Land Use	Vacation Rentals	N	We urge the Sonoma County Planning Commission and Board of Supervisors to reject the proposed Rule and not to delegate the creation of performance standards and / or restrictions to the TSRA Board.
106	10/5/21	Burke, Bryany	Andrew Mann Architecture	360 Langston Street, Suite 302 SF, CA	bryany@andrewmannarchitecture.com	Land Use	Housing	N	I'm working on a residential project for a client at The Sea Ranch. In the past, review of habitat areas at the Sea Ranch has been under the purview of The Sea Ranch Association. As the new LCP and ESHA maps become relevant over lots at The Sea Ranch, we are finding that properties which were created for residences in earlier subdivisions are becoming largely unbuildable for neighborhood appropriate residences under the changing standards at PRMD. What can be done for these affected properties so that the owners are not left with lots that cannot be developed for reasonable residential use?
107-1	9/21/21	Glass, Una	The City of Sebastopol	Sebastopol, CA	N/A	Land Use	Vacation Rentals	Y	Short term rentals affect the availability of housing, housing affordability, and traffic.
107-2	9/21/21	Glass, Una	The City of Sebastopol	Sebastopol, CA	N/A	Land Use	Circulation and Transit	Y	Traffic through Sebastopol has increased significantly due to tourist attractions oat the coast. California has adopted laws related to VMT, but this is not really addressed in the plan. The coast is a recreational resource for residents of Sebastopol. Intense use at the coast will overburden narrow winding roads, increasing danger to residents when they go to enjoy coastal recreation, as well as burdening emergency health services. Additionally, emergency services are increasing with more tourism; need to address health services.
107-3	9/21/21	Glass, Una	The City of Sebastopol	Sebastopol, CA	N/A	Land Use	Water Resources	Y	Intensification of land uses in the coastal zone, including large scale tourism and wineries, where water resources are known to be scarce, will affect the quantity of water available at the coast. This may impact demand for water sales by the City of Sebastopol to potable water haulers.



## Local Costal Program Update Estero Americano Comment Summary

Comment #	Comment Date	Name	Organization	Address	Email	LCP Section	Category	Summary
1E	9/14/21	Neale, Bob	Sonoma Land Trust	Estero Americano	bob@sonomalandtrust.org	Public Access	Map Correction	Addresses/apologizes for the decision to not request removal of the K2 point from the draft LCP. Emphasizes role in this process-- as a private land owner.
2E	3/24/22	Tibbetts, Danny	N/A	Bodega Bay	N/A	Public Access	Access Points	Addresses the questions regarding access points. There was no access component at the time of acquisition.
3E	3/25/22	Tibbetts, Danny	N/A	Bodega Bay	N/A	Public Access	Access Points	Additional correspondence between SLT and Estero neighbors to correct the published minutes from the march 3rd hearing on public access. Forwards an email from Bob Neale(SLT) regarding the Trailhead. SLT has no plans for developing a public access point or trailhead at the location in Figure C-PA-1k.
4E	4/18/22	Biglione, Tom	N/A	Sacramento	ftbiglione@gmail.com	Public Access	Paddling	Paddlers should be concerned about continued access to the Estero Americano.
5E	4/19/22	Dye, John	N/A	Estero Americano	john@riversforchange.org	Public Access	Paddling	Many landowners have blocked access to the Marsh Road access point. He emphasizes the terms of responsible use of the Estero. Desires a road sign indicating the road as public as well as a public access point. Exhibit A-K
6E	4/19/22	Kardos, Jennifer	N/A	Estero Americano	N/A	Public Access	Paddling	Paddlers often assist in the cleanup of the Estero while paddling. Private landowners block the road which inherently gives them more rights than the people of CA.
7E	4/19/22	Mallory, Dick	N/A	Estero Americano	N/A	Public Access	Paddling	State laws indicate that there is a right to public access in bridge covered cross waterways.
8E	4/19/22	Sarfati, Jacqueline	N/A	Estero Americano	jsingle@inreach.com	Public Access	Paddling	Many people respectfully use the Estero for kayaking and would be devastated to have the access taken away.
9E	4/19/22	Wells, Penny	N/A	Estero Americano	N/A	Public Access	Paddling	Has been paddling at the Estero for 40 years and has never once witnessed noise issues, or other public disturbances that landowners complain about. Marsh Road should be identified as a public road/access point.
10E	4/21/22	Colton, Thomas	Bay Area Sea Kayakers	Estero Americano	N/A	Public Access	Paddling	It would be shame for public access to the Marsh Road access point were to be taken away. He lists concerns on how this public access could be confirmed/solidified. He is also open to compromises, but of course those that benefit the kayakers/paddlers.
11E	4/21/22	Moss, Larry	N/A	Estero Americano	N/A	Public Access	Paddling	The actions of a few (littering, being disrespectful to the land) should not determine whether public access should continue to be allowed. A majority of paddlers/kayakers respect the space and do not tarnish it.
12E	4/21/22	Norton, Patrick	N/A	Estero Americano	N/A	Public Access	Paddling	A majority of trash in the Estero is most likely from the ocean at high tide (crab traps, rope, etc). The water trail is very important to the recreational landscape.
13E	4/21/22	Norton, Kristine	N/A	Estero Americano	N/A	Public Access	Paddling	She and her fellow kayakers/paddlers are very respectful of the water and area. More often than not, they are helping to clean up debris that they find. Please maintain public access.
14E	4/21/22	Steinhart, Beck/Trey	N/A	Estero Americano	N/A	Public Access	Paddling	Fond memories kayaking at the Estero, and will usually end up picking up trash that is predominantly left by others, not even themselves. Please keep public access available.
15E	4/21/22	Tescallo, Rudolph	N/A	Estero Americano	N/A	Public Access	Paddling	Hopes that public access will be continued, as he and many others use the beautiful landscape as a means to get away from densely populated areas.
16E	4/22/22	Mallory, Dick	N/A	Estero Americano	N/A	Public Access	Paddling	Shutting out the public from the coast is not at all Californian. Organized Kayak clubs encourage members to inform the casual visitors to not trespass and pick up after themselves.
17E	4/23/22	Wiscombe, Warren	N/A	Estero Americano	N/A	Public Access	Paddling	Kayakers are very respectful of the spaces they use. Notes that cow poo washes into the water when it rains, and if ranchers are going to complain about kayak litter, they should be aware of their own. The Estero is a really good for new kayakers to learn as it is a safe environment. Please continue to allow public access.
18E	4/25/22	Mulligan, Jay	N/A	Estero Americano	N/A	Public Access	Paddling	Maintain access for kayakers.
19E	4/28/22	Ingram, Lynda	N/A	Estero Americano	N/A	Public Access	Paddling	Has been enjoying access for at least 22 years. She has only paddled with people who are equally respectful to the space, and desires public access to remain.
20E	4/29/22	Colton, Thomas	N/A	Estero Americano	N/A	Public Access	Paddling	A new hiker trail, potential added kayaker stops, and restrooms will be a great addition to the water trail.
21E	4/29/22	Nagle, Henry	Bay Area Sea Kayakers	Estero Americano	N/A	Public Access	Paddling	He and all the other kayakers who are respectful of the land would appreciate continued access to the Estero.
22E	4/29/22	Smith, Hollie	N/A	Estero Americano	N/A	Public Access	Paddling	Suggests signs that clearly define the borders between private and public land for rec users. Please allow for public access to continue.

23E	4/30/22	Mallory, Dick	N/A	Estero Americano	N/A	Public Access	Paddling	Understands that private property should not be trespassed on, so he suggests putting up signs to indicate where the private land is, as well as responsible etiquette.
24E	5/1/22	Kepner, Alan	N/A	Estero Americano	N/A	Public Access	Paddling	The Estero allows for many people to see so many beautiful aspects of nature and this should be something that is continued.
25E	5/1/22	Ogilvie, Chris	N/A	Estero Americano	N/A	Public Access	Paddling	He has only used the Marsh Road access on the Marin County side. He would like to see other access points, and also acknowledges the need for respecting landowners
26E	5/1/22	Prindiville, Mike	N/A	Estero Americano	mikeprindi@gmail.com	Public Access	Paddling	Has been enjoying the Estero for years and often times participates in cleaning up garbage from the water. Many other kayakers do this too. Please continue to allow public access.
27E	5/13/22	Bruzzone, Beth	N/A	Estero Americano	N/A	Public Access	Map Correction	5 points on the map are listed incorrectly. K-1 is on private property without owner's permission. K-2 is not accessible to the public without the Estero or Private property. K-3 is also on private property. K-4 is in Marin therefore has no place on SoCo LCP map. K-5 is on the Bordessa Property. K-1 and K-5 in particular need to be modified due to trespassing.

## COMMENT 1

**From:** [Cea Higgins](#)  
**To:** [Gary Helfrich](#)  
**Subject:** re: Aquaculture: Goal C-AR-7, Objective C-AR-7.1, Policy C-AR-7a&b  
**Date:** Saturday, July 24, 2021 5:24:29 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[Aquaculture-Principles-Public-20210604.pdf](#)

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### EXTERNAL

Hello Gary,

I have previously commented on the new aquaculture goals, policies, and objectives and wanted to re-emphasize that inclusion of aquaculture in the revised draft should address the potential impacts unique to this type of cultivation, limit areas where land & ocean based operations can occur (i.e. ESHA, ABS, archeological or historic resources...), be consistent with state permitting guidelines, and include provisions to reduce environmental impacts or prohibit certain types of destructive practices and operations.

Aquacultural activities, like any other type of “farming”, have an effect on the surrounding ecosystems with numerous environmental impacts currently associated with its operations and practices such as but not limited to pollution from solid waste and effluent by-products, pesticide and antibiotic residues, introductions of species to non-native environments, and transmission of disease between individual organisms and to other species. In addition, as aquaculture is “ocean dependent” it presents impacts separate and unique to other agricultural practices.

The current proposed LCP language that proposes that aquaculture be regulated in the same manner as agriculture may be “consistent” with the General Plan but as well understood, Local Coastal Plan policies on aquaculture must also adhere to the Coastal Act, state aquaculture permitting guidelines, and be informed by best available science.

I have attached and included a link to the Ocean Protection Council “Guiding Principles for Sustainable Marine Aquaculture in California” so it can be of use in revising the proposed LCP language below to be more comprehensive, science-based, considerate of environmental impacts, and consistent with state and Federal aquaculture policies.

[Aquaculture-Principles-Public-20210604.pdf \(ca.gov\)](#)

### **Aquaculture:**

**Goal C-AR-7:** Provide for the raising, harvesting and production of fish in the same manner as

the harvesting and production of agricultural products.

**Objective C-AR-7.1:** Allow aquaculture and its related facilities and activities in agricultural areas.

**Objective C-AR-7.2:** Provide opportunities for development of support facilities for the fishing industry on appropriate lands.

**Objective C-AR-7.3:** Promote products of the fishing industry in the same manner as agricultural products.

**Policy C-AR-7a:** Outdoor aquaculture shall be permitted in the same manner as other agricultural production uses. (GP2020)

**Policy C-AR-7b:** Support facilities for the fishing industry, including but not limited to equipment storage, processing facilities, and canneries may be allowed on lands designated for agricultural land use adjacent to the Urban Service Boundary of Bodega Bay. If the facility or use requires urban services, extension of such services on lands adjacent to the Urban Service Boundary may only be permitted for that purpose. Ensure that such uses are clearly subordinate to on-site aquaculture production and do not adversely affect agricultural production in the area.

The following criteria shall be used for approval of aquaculture processing or service uses:

(1) The use is subordinate to on-site aquaculture and agriculture production based on the following considerations:

- a. The portion of the site devoted to the support use in relation to production.
- b. The size and number of structures needed for the support use in relation to production.
- c. The relative number of employees devoted to the support use in comparison to that needed for production.
- d. The uses on the site in the past and present.
- e. The potential for the support use to be converted to non-agricultural uses due to its location and access.

(2) The use would not convert agricultural lands inconsistent with Coastal Act Sections 30241 and 30242.

(3) The use does not substantially detract from agricultural production on-site.

(4) The use does not create a concentration of commercial uses in the immediate area.

(5) The use is compatible with and does not adversely impact surrounding residential neighborhoods. (New)

Kind Regards,

*Cea Higgins*

Advocacy Coordinator

Coastwalk/California Coastal Trail Association



707 829 6689 office

707 217 9741 cell

[Cea@coastwalk.org](mailto:Cea@coastwalk.org)

[www.coastwalk.org](http://www.coastwalk.org)



*Coastwalk believes that through stewardship of the California Coast, people find a balance between their profound need to experience the coast and the need to preserve its fragile environment. We are a grassroots non-profit organization that inspires, educates, and advocates for both coastal protection and responsible public access. We create a community of coastal stewards through our unique guided coastal hiking experiences, providing Trail information, and our work to complete and sustain the California Coastal Trail.*

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## COMMENT 2

**From:** [Dawnine Dyer](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Objections to new restrictions on short term rental at the Sea Ranch  
**Date:** Sunday, July 25, 2021 6:58:42 PM

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### EXTERNAL

> As owners of a home at The Sea Ranch we write to oppose restrictions by Sonoma County on short term rentals, including restrictions on the number of days a home can be rented, and on restrictions as to distance between rental units.

> While the whole world grapples with the impacts of VRBO and other online short term rental apps, this is a different subject. We have rented our house through the same local agency for 25 years and value their knowledge of the unique resources of TSR and their ability to inform renters of their responsibilities as renters. The nuisance ordinances already in place at TSR are sufficient, and we understand Sea Ranch security feels they have sufficient control over the infrequent incidents of noise, and so on. Nuisance control should be at a neighborhood level, rather than a County issue. The TSRA Board has not done any studies that justify their recommendations, which their own Task Force did not support.

>

> We became Sea Ranch home owners, only after benefitting from short term rentals. which serve as an introduction the the area, while providing a revenue stream to the County from taxes collected.

>

> We support the performance standards as per the revised Sonoma County Coastal Plan.

>

> Submitted by:

> Bill and Dawnine Dyer

> 37977 Sentinel Close

> Unit 21 Lot 149, The Sea Ranch

Sent from my iPad

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**From:** [Deborah Eppstein](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Costal Vacation Rentals at Sea Ranch  
**Date:** Saturday, July 24, 2021 9:45:56 PM

---

COMMENT 3

## EXTERNAL

We have enjoyed renting homes in Sea Ranch for years, and hope that this will not be restricted. Most renters are families looking for a family get-a-way from the Bay Area, and are not large groups of party seekers. Sea Ranch has many internal policies (thus very different from properties in the Russian River area) that are strictly enforced that ensure that the renters do not disturb the community.

Please do not place additional restrictions on rental properties in Sea Ranch as this provides a lovely opportunity for families to enjoy the beautiful North Sonoma Coast, and also brings in good tax revenue to Sonoma County.

Thank you.  
Sincerely,  
Deborah Eppstein  
Sonoma County

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## Local Coastal Plan Update Feedback – Coastal MAC

Friday July 23,2021

### Introduction

I have been a full-time resident of the Sonoma County Coastal Zone, living in Timber Cove sub-division, since 2013. I am also:

- Owner of both my home and an adjacent vacant parcel;
- Timber Cove Homeowners Association Board member and member of the Architectural sub-committee;
- Previous Board member of Timber Cove County Water District;
- Previous Employee of Timber Cove Resort;
- Independent development consultant.

Prior to moving to Timber Cove, I lived for 14 years on the south coast of Big Sur – living and working within the Monterey County Coastal Zone.

### Involvement with the LCP Update

I have been actively involved with the LCP Update process since the September 2019 version was released. I have attended almost all in-person LCP update meetings along the Sonoma Coast and have attended all online focused workshops.

My interest and review of the LCP update relates generally to the Timber Cove section of the document and how it will influence and shape the next 20 years of our community.



## Comments

### ***Community Feedback Process***

I am an avid supporter of strong community involvement within the planning process of my local community and welcomed the possibility of this with the LCP Update. I have found the actual experience very one-sided and not open to dialogue and consideration of community involvement in decision-making.

There has also been confusion in getting accurate documents to review and work with, as well as unrealistic deadlines to respond to.

### ***Community Economic and Social Well-Being***

The Coastal Act declares:

- d) That existing developed uses, and future developments that are carefully planned and developed consistent with the policies of this division, are essential to the economic and social well-being of the people of this state and especially to working persons employed within the coastal zone. (Section 30001)*

The LCP Update fails to fully address the economic and social well-being of the resident communities within the coastal zone. Similarly omitted is an understanding of the needs and impacts of the transient community that live outside of the coastal zone – tourists.

### ***Lack of Depth of Understanding of Community***

There is an inherent lack of understanding of the particular characteristics and issues being faced by the different communities within the Coastal zone. The LCP Update does provide very specific data on differences between regions in the Coastal Zone, for example, for natural communities through ESHA maps. However, this same level of attention is not applied to the economic and social factors of the different communities, which would allow for the development of policies that reflect the real issues facing a community on the coast. Similarly, the absence of meaningful data means that a framework for the community for the next 20 years – the duration of this planning document - is either non-existent, or based on incorrect assumptions.

Some examples of this for Timber Cove include:

- Affordable / Workforce Housing (Policy C-LU-5d);
- Application of General Plan policies in the absence of more realistic alternatives (eg. Transportation);
- Education (Page PF-11).

This lack of understanding of real issues is also reflected in the lack of urgency for issues of immediate concern to the community. For example:

- Coastal Permit Process for Fire Abatement (Program C-OSRC-7);
- Ordinance to allow workforce / employee housing (C-LU-2);

The LCP Update also fails to address or support community concerns that occur within the coastal zone, but are the responsibility of other regulatory agencies. Examples include:

- Relevance of Land Use Priorities established by the Coastal Commission (Figure C-LU-1);
- Alternative Septic options.

**Local Business**

There has been a lack of engagement with the business community within Timber Cove, instead relying on information collected as far back as 1980. The LCP Update sets policies that serve to control the potential for private businesses to expand (or contract). These policies are not based upon any zoning codes or CEQA guidelines, (which any development would need to adhere to), but upon decisions made by authors of the LCP at their own discretion. These private business-directed policies should be removed.

- Policy C-LU-6h: Ocean Cove Store;
- Policy C-LU-6i: Ocean Cove Resort;
- Policy C-LU-6j: Ocean Cove Resort;
- Policy C-LU-6k: Stillwater Cove Ranch;
- Policy C-LU-6l: Timber Cove Inn;
- Policy C-LU-6m: Timber Cove Boat Landing;
- Policy C-LU-6n: Fort Ross Store.

**Public Access**

There has been no engagement with private landowners regarding designated areas of public access. This has caused inaccuracies in locations, as well as confusion about the ramifications of a point designated as public access to private landowners (Figure C-PA-1e: E9, E10, E11).

**Geotechnical Hazard**

The California Coast is under increasing threat from impacts of climate change and sea level rise. The current LCP states:

*Prohibit development within 100 feet of a bluff edge or within any area designated unstable to marginally stable on Hazards maps **unless a registered engineering geologist reviews and approves** all grading, site preparation, drainage, leachfield and foundation plans of any proposed building and determines there will be no significant impacts. The engineering geologist report shall contain, at a minimum, the information specified in the Coastal Administrative Manual (LCP III-21, Recommendation 2.)*

The updated LCP revises this to:

**Policy C-PS-2i:** *Applications for new development or redevelopment on coastal bluff property shall be required to include a site-specific coastal bluff erosion hazards report from a licensed Geotechnical Engineer, Engineering Geologist, or Geophysicist that establishes a geologic setback line for proposed new temporary (e.g., gazebos and portable spas) and permanent (e.g., roads, driveways, water lines, drainage improvements, and septic systems and leachfields) structures and infrastructure. **This setback shall be no less than 100 feet** and shall establish where on the bluff top stability can reasonably be assured for the economic life of the development (no less than 100 years). All new structures for human occupancy and infrastructure located on a bluff top shall be setback to ensure that it will not be endangered by coastal bluff erosion, retreat, and collapse; and thereby avoid the need for shoreline protection devices during the economic life of the development. The effect of any existing shoreline protective devices shall not be factored into the required stability analysis.*

The updated policy introduces a **minimum 100 foot setback**, regardless of the conclusion of an expert analysis for that specific location.

The geotechnical nature of the coastline varies greatly, and given the extreme liability and safety concerns of bluff erosion and stability, a geotechnical analysis prepared by a licensed engineer is an absolute must. However, in setting an arbitrary minimum setback of 100 feet, regardless of expert opinion for the specific site, the LCP Update is disregarding expert findings and potentially deeming vacant parcels undevelopable.

#### ***Errors and other Inaccuracies***

- Table C-LU-1:
  - Timber Cove Resort, not Lodge;
  - Number of rooms – 46, not 42;
  - All other references to Timber Cove Inn should be Timber Cove Resort.
- Page OSRC-4: Community specific guidelines – inconsistent with Policies C-OSRC – 4b and 4f;
- Table C-PF-1: Characteristics of Public Water Systems:
  - Timber Cove Inn: # connections / lots served – 3 -- what does this mean?

COMMENT 5

**From:** [Mary Hansell](#)  
**To:** [PRMD-LCP-Update](#)  
**Cc:** [Carl Serrato](#)  
**Subject:** Short Term Rentals at The Sea Ranch  
**Date:** Sunday, July 25, 2021 7:10:00 PM

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EXTERNAL

To Sonoma County Planning Department:

Our family closed the purchase on a home at Sea Ranch on June 1, 2021. We bought a four bedroom house on Cormorant Close, Sea Ranch with the intention of upgrading the property and continuing it as a part-time vacation rental. This afternoon, we became aware of the issue being considered by Sonoma County Supervisors tomorrow related to short term rental regulation at The Sea Ranch. We have read quickly over the past couple of hours and are concerned about restrictions being proposed, in particular concerning maximum nights of rental per year, maximum occupancy of 8 persons and minimum distance of 300 feet between short term rental properties. We made the purchase contingent on the financial plan to bring in rental income; the house was rented to up to 10 people for over twenty years and a large, older vacation rental is positioned next door. You can see the problems we would face.

In addition, we came to know and love The Sea Ranch through our own stays as short term renters. Please do not reduce access to short term rentals at The Sea Ranch.

Sincerely,

Mary J Hansell Carl A Serrato  
[mjhansell@yahoo.com](mailto:mjhansell@yahoo.com)  
t. 650-430-6483

[serratoca@gmail.com](mailto:serratoca@gmail.com)  
t. 650- 576-5139

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## COMMENT 6

**From:** [Bryce G. Hoffman](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Cc:** [Lynda Hopkins](#); [nmoran@tsra.org](#); [csjaap@gmail.com](#); [snevin@tsra.org](#); [mkleeman@tsra.org](#); [maggiecc@protonmail.com](#); [karen@amiel-phillips.com](#); [malonsomartinez@tsra.org](#)  
**Subject:** Short-Term Rental Regulation  
**Date:** Sunday, July 25, 2021 5:28:50 PM

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### EXTERNAL

Dear commissioners and county staff,

I am a resident of The Sea Ranch, and I am writing to you today to urge you to act to protect our coastal communities and their residents from the continued harm caused by the unregulated and unrestricted short-terms rental industry.

As someone who grew up on the North Coast, I can tell you that the entry of Airbnb, Vacasa, and other technology-driven corporations has fundamentally altered the short-term rental business in this area, dramatically increasing the number of guests, reducing the length of the average stay, and increasing the amount of time units enrolled in these programs are occupied by tourists. This has had a significant, deleterious impact on the quality of life of those of us who live in neighborhoods with a high density of short-term rental properties.

More than 40 percent of the homes in the neighborhood I live in at The Sea Ranch are now enrolled in these short-term rental programs. While many of their guests are respectful of our community's rules and the laws of Sonoma County, many are not. Over the past year, we have had to contend with midnight parties that left beer cans strewn across the lawn, off-leash dogs chasing fauns, guests driving their vehicles through tall grass during the height of fire season, multiple instances of trespassing, and other challenges to our right to the quiet enjoyment of our property. Worse still, some of these rental properties continued to operate through the spring and summer of 2020 in open defiance of Sonoma County's public health orders.

And the problem is only getting worse.

Because our coastal communities lag behind other so-called "destination areas" in California when it comes to enacting commons-sense restrictions on these businesses, more investors are purchasing property here to grow their rental property portfolios because they can no longer do so elsewhere. At the same time, as communities from Palm Springs to Lake Tahoe to our own Russian River move to limit short-term rentals, more short-term renters find themselves directed to our communities.

All of this directly threatens the residential character of our communities, while at the same time making a mockery of our zoning regulations.

## COMMENT 6

Let me give you an example of what I mean by that. In the past week, the rental property next door to my house has hosted three different sets of guests, five visits by housekeeping staff, two visits by spa cleaning staff, and three visits by maintenance staff. That level of activity and traffic is hardly in keeping with the residential zoning of this neighborhood. It is commercial activity, plain and simple. And this is just one property; there are four others on my street with similar levels of activity.

As you are no doubt aware, short-term rentals have become a major – and contentious – issue here at The Sea Ranch, pitting full- and part-time residents and responsible rental owners who understand the need for regulation against a small but vocal minority of short-term rental business owners who are concerned about the impact such regulations might have on their bottom line.

In 2019, The Sea Ranch Association board of directors empaneled a Short-Term Rental Task Force to study the problem and make recommendations. That task force was made up of both full-time residents and part-time rental owners. It held numerous public hearings, both in person and online, and conducted extensive studies of the problem before recommending to our board that it enact comprehensive regulations to restrict the number, density, and occupancy levels of short-term rental properties at The Sea Ranch.

When our board learned that Sonoma County was considering similar restrictions, it wisely decided to subordinate its efforts to those of the county as a whole, rather than pursue a course different from the rest of the county. However, at the request of county officials, our elected representatives drafted Model Rule 6.7 and approved its submission to the county as a potential starting point for the county's own regulations.

This draft rule was the product of the extensive work of our Short-Term Rental Task Force and the many public workshops it conducted in our community on this issue. That it was approved unanimously by our often-divided board is a testament to the strong support it has from residents here at The Sea Ranch.

I recognize that there are some who would try to convince you that this is not the case. After this draft rule was approved and submitted to the county for consideration, some short-term rental business owners organized themselves and launched an aggressive, well-funded misinformation campaign in a desperate bid to prevent the county from acting on this important issue.

It is worth noting that many, if not most, of these folks are absentee property owners who do not live – or vote – in Sonoma County.

While I would never argue against the rights of business owners to conduct their business in accordance with local laws and restrictions, I have a real problem when those business owners insist on the right to do so in a residential area that is not zoned for this high volume of commerce.

The draft regulations approved by our board would still give responsible homeowners ample opportunity to help pay for their second homes with the revenue generated by renting them out. They would also allow The Sea Ranch to continue to offer plenty of accommodations for visitors who want to enjoy the rugged beauty of our North Coast. What they will not do is allow a shadow lodging industry to enjoy unrestricted access to our residential neighborhoods, to continue to erode our quality of life, and to continue to imperil our very sense of community.

I urge you to consider it as a model as you help Sonoma County draft meaningful regulations to prevent that from happening. But more than anything, I urge you to act soon and decisively on this important issue.

Thank you.

*Bryce G. Hoffman*

[brycehoffman.com](http://brycehoffman.com)

104 Anchorage Close, The Sea Ranch

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## COMMENT 7

**From:** [Carolyn Hsu and Jacquelyn Moorad](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Subject:** In Support of Sea Ranch Short Term Rentals  
**Date:** Saturday, July 24, 2021 12:53:05 PM

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### EXTERNAL

Dear Sonoma County Planning Commission,

We are a gay couple in our 40s who rented at Sea Ranch for long weekends. We were attracted to the area for its sublime beauty, but especially for its reputation for being inclusive to all. At the new member meeting we attended after we bought our house, our then nine month old son sat in the courtyard of the DelMar Center watching the butterflies and hummingbirds, until one of the members holding the meeting asked us to bring him inside, because, as he said, these new children were the future of Sea Ranch. He is now seven, and we have a two year old as well, and we have tried to raise them to be guardians of the land in this magnificent part of the California coast. We have been so grateful for the stewardship and care that TSR has provided, and the incredible community that has always supported us here. We often tell our children that this land does not belong to us, but rather we have the important and incredibly privileged role of keeping it safe and accessible for all to enjoy. While at the SFMOMA exhibit on The Sea Ranch, we were taken by a giant poster that the founding members created which outlined the Sea Ranch Principles in two columns labeled YES and NO. Under the Yes column, there was: Diversity: People, Income, Professions, Interests. And under the No column: Uniformity. Short Term Rentals provide that diversity and accessibility. The California Coast should be open to all, and the access that rentals provide steers us away from individualism and towards a broader sense of collectivism. We fear that limiting Short Term Rentals in The Sea Ranch will restrict access to a diverse group of people, and for that we thoroughly support the Sea Ranch Hosting Coalition's goal of providing access to the Sonoma coast to a broad range of visitors, supporting the local economy, and keeping Sea Ranch accessible to all.

Thank you,  
Carolyn Hsu and Jacquelyn Moorad



<b>SEA RANCH PRINCIPLES</b>	
<b>YES</b>	<b>NO</b>
Nature predominates (rural matrix)	Vest pocket nature (as at Camel or Bodega)
Rural	Suburban
Communally	Individual houses
Aesthetics (major overall concern for art, architecture, graphics, signs)	Aesthetics (up for grabs)
Design control (AIA etc. awards over the years)	No control (see the butcher of highway 1)
Diversity People Income Profession Interests	Uniformity
Non-elitist	Elitist (Pebble Beach/Carmel)
Moderacy of house size	Enormous houses
Reforestation.	Individual planting
Maintain unique character (North coast)	Relinquish character (any other 2nd home community)
Native trees	Exotics
Preserve access (to coastline and views)	Relinquish access (Malibu type)
Common facilities trails recreation vigorous association playgrounds vegetable gardens activities	Individuals only
Simplicity	Flamboyance

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**From:** [Shaheen Kazi](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Cc:** [Shaheen Kazi](#)  
**Subject:** Keep The Sea Ranch Open to Short-term Rentals  
**Date:** Saturday, July 24, 2021 2:08:09 PM

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## EXTERNAL

Hello Sonoma County Team,

Several times a month I receive such lovely messages from families who thank us for sharing our home at The Sea Ranch with them. Our home has become their happy place. Our home is used for celebrating birthdays, anniversaries and special occasions, where families can spend time with each other in a beautiful setting over a month, a week or even a long weekend..

I'm a homeowner at The Sea Ranch. We bought our home there as a second home after experiencing the beauty and magic of the place after several weekend stays there as a short-term renter. We've had our home now for 5-years. We spent the first 3+ years fixing it up and updating it to current standards -- all done with permits, of course. While we love coming there and treasure our time there, we're unable to stay there permanently or even come every weekend. Last year, just prior to the pandemic lockdown, we put our home up for short-term rentals, with the idea of sharing the beauty of the place and our home for others to discover and enjoy, just as we had years before. Of course when the lock down began we had to cancel and reschedule any reservations we already had to later in the year when the county and TSRA opened up for STR. Since then we've had a number of guests who stayed at our home, thanked us for sharing our home with them, and given us 5-star reviews. We are very careful about who we rent to and our guests have all been responsible and taken great care of our home. We have house rules in place, which are all followed. These include not only rules within our home, but also when at the Sea Ranch. We inform our guests of TSRA policies on "peaceful enjoyment" of the lovely surroundings, quiet hours after 9pm and no light pollution. Our guests are respectful of these rules and of our neighbors and we've not had a single incident of abuse of the rules.

Our guests have allowed us to offset the sizable expenses of having our second home, We find now that we enjoy our home at the Sea Ranch so much more now as the income from the rentals allows us to maintain the home and keep it in top shape. In fact we find our second home is kept in much better shape than our primary home, because our guests both expect us to maintain it at the highest standards and help us financially to keep it so.

Even prior to putting our home up for vacation rentals, each time we would visit the Sea Ranch, we would find how much more pleasant and livelier the place is with renters hiking and trails and exploring the place. In general on weekdays, the Sea Ranch can feel desolate and lifeless. Weekend renters bring energy, joy and life to the place. They also keep the homes at Sea Ranch safer from predators by being there and occupying otherwise empty homes.

Many of our renters aspire to become future owners of homes at the Sea Ranch, when they can save up or their circumstances allow them to make the purchase. Short-term rentals help democratize access to the Sea Ranch and the beautiful Sonoma coast, which otherwise would not be affordable to them. Is it not more democratic to share beautiful places, rather than keep them exclusively for the wealthy?

## COMMENT 8

We've heard there are moves to limit short-term rentals at the Sea Ranch. This will hurt us, our visitors, all home owners at Sea Ranch, including those who do not rent out their homes, and ultimately will ruin the overall Sea Ranch community and the broader local economy. I do not believe anyone wants that.

We ask you to keep the Sea Ranch an open community for those who want to experience the beauty of the place without having to buy property there. We as home owners who rent commit to self-regulating ourselves and ensuring our guests are screened and follow the rules of the Sea Ranch Community.

Sincerely,

Shaheen Kazi  
Sea Ranch Homeowner

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**From:** [Wendy Krupnick](#)  
**To:** [Gary Helfrich](#)  
**Cc:** [Caitlin Cornwall](#); [greg99pole@gmail.com](mailto:greg99pole@gmail.com); [Jacquelynne Ocana](#); [Eric Koenigshofer](#); [ejklaw@yahoo.com](mailto:ejklaw@yahoo.com); [Kevin.Deas@deasproperties.com](mailto:Kevin.Deas@deasproperties.com)  
**Subject:** Local Coastal Plan  
**Date:** Monday, July 26, 2021 8:50:44 AM

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## EXTERNAL

Dear Mr. Helfrich,

I may not be able to attend this afternoon's hearing so wanted to submit the following comments regarding the Agricultural Element of the draft revised Local Coastal Plan. I'm sorry that we have not had time to create a formal letter; this is a busy time for those of us in agriculture, with many additional challenges this year and many local issues to try to attend to as well. Because this document is so large and so important, a second hearing preceded by active notice to concerned stakeholder groups could be valuable to allow for more public input

Please see the statements below which relate to sections of the draft Ag Element also below.

Thank you for considering our comments.

Wendy Krupnick

Vice President, Community Alliance with Family Farmers, (CAFF), Sonoma County Chapter

Comments on draft LCP, Ag Element:

Statements in bold below in the draft LCP negate the value of production on smaller parcels, which have the MOST potential for production for new farmers/ranchers and can have much higher revenue per acre than larger parcels. **THERE IS NO CORRELATION BETWEEN PARCEL SIZE AND POTENTIAL AGRICULTURAL VIABILITY.** Today's markets value pastured poultry, locally grown vegetables, berries and other crops that are well adapted to the coast and very appropriate for small parcels.

This false assumption is the basis for some other proposed policies that follow. Not sure if **Policy C-AR-4a:** is appropriate or should be changed?

A criteria to add to **Policy C-AR-5c** is availability of adequate long term water supply.

On farmworker housing, how would **Policy C-AR-6a** be monitored to assure homes actually occupied by farm workers? 4 additional homes is a lot!

Sonoma County Local Coastal Plan | Public Review Draft  
 Agricultural Resources Element Page AR-4

## 4 AGRICULTURAL RESOURCES POLICIES 4.1

### RESIDENTIAL SUBDIVISION POTENTIAL

Complaints about noise, odors, flies, spraying of pesticides, and similar nuisances related to

agricultural practices may discourage and sometimes prevent farmers from managing their operations

in an efficient and economic manner. Large lot sizes can reduce conflicts between agricultural and

non-agricultural land uses by allowing for buffers between the two. The Right to Farm Ordinance (referenced below in Policy C-AR-3c) also reduces the potential for such conflicts by requiring property owners to acknowledge the agricultural use of land in the area. Together with the Land Use Element, the Agricultural Resources Element establishes policies that maintain large parcel sizes in agricultural areas, and support the needs and practices of agriculture as the highest priority in areas designated for agricultural use.

## Goals, Objectives, and Policies | Residential Subdivision

Potential GOAL C-AR-1: Maintain the maximum amount of agricultural land in parcel sizes that are **large enough to sustain a viable commercial agricultural operation**. Objective C-AR-1.1: Avoid the conversion of agricultural lands to residential or non-agricultural commercial uses.

Objective C-AR-1.2: In the Land Extensive Agriculture and Diverse Agriculture land use categories, **maintain the largest land area for agricultural use**. Limit the number of cluster lots on any one area to avoid the potential conflicts associated with residential intrusion.

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**From:** glenn.n  
**To:** PRMD-LCP-Update  
**Subject:** sea ranch short term rentals  
**Date:** Sunday, July 25, 2021 6:11:14 PM

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EXTERNAL

Dear Mr. Gary Helfrich:

I am a homeowner at The Sea Ranch. I rent out my house on a short term basis and want to be able to continue to do so. I visit The Sea Ranch on a yearly basis, and have done so for decades, since the early 1990's. I contribute to the local economy by visiting, shopping, and by hiring a local rental agency to manage my property. I also contributed to the local economy (realtors, architects, designers, construction and supply companies) by building my house.

If not for the short term rental market I would never have been introduced to the area.

I support the position of TSRHC, as they have outlined below.

1.  
**We support reasonable performance standards** -- indeed we already exceed them and have done so for decades. We know badly managed rentals cause problems for neighbors and welcome bringing everyone up to the same bar.
2.  
We provide public access to the Sonoma coast to a diverse range of visitors, supporting the local tourism economy and generating tax revenue for the County.
3.  
The County of Sonoma **should not support or endorse the TSRA Board's "Model Rule 6.7"** or other restrictions on Short Term Rentals at The Sea Ranch, as mentioned (but **not** proposed) within the **Sonoma County Local Coastal Plan Update Policy Option: Vacation Rentals:**
  - (1) **Limits on the total number of vacation rentals** allowed on The Sea Ranch. This is a blunt instrument not targeted to any demonstrated problem.
  - (2) **Limits on the proximity of vacation rentals to each other** These mean each rental takes away the rights of many owners to also rent their homes
  - (3) **Limits on the number of days a residential unit can be used** as a vacation rental during a given time period.

The County of Sonoma **should not delegate short-term rental performance standards or restrictions on The Sea Ranch to The Sea Ranch Association.**

Please do not restrict our ability to open our homes to others on a short term basis.

Thank you,

Glenn Nakazawa  
35011 Crows Nest Drive  
The Sea Ranch  
408 483 4966

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## COMMENT 11

**From:** [Tom O'Neil](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Cc:** [Liz O'Neil](#)  
**Subject:** Sea Ranch Short-term Rentals  
**Date:** Sunday, July 25, 2021 7:00:23 PM

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### EXTERNAL

Hello,

We just recently heard the Sonoma County Planning Commission and Board of Supervisors will be considering proposed restrictions on short-term rentals at The Sea Ranch. We are concerned that the process and recommendations were rushed and the voices of those of us at Sea Ranch who rent our homes were not adequately heard. We are concerned that the proposed restrictions would harm us and many others in the community.

We initially rented for many years at Sea Ranch which is why we chose to purchase a home there. We rent out our home on a short-term basis throughout the year. Restrictions on short-term rentals would harm our income, as well as the incomes of many others living in Sea Ranch and the surrounding community who provide services to renting homeowners and renters, including nearby stores and restaurants.

We ask the Sonoma County Planning Commission and Board of Supervisors to reject the proposed restrictions and not delegate the creation of performance standards and restrictions to the TSRA Board.

Thanks very much for your consideration.

Best Regards,

Liz and Tom O'Neil

--

Tom O'Neil  
e-mail: [tom.p.oneil@gmail.com](mailto:tom.p.oneil@gmail.com)  
cell: 415-637-1250

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**From:** [Don Rhett](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Subject:** Opposition to The Sea Ranch Association Board Model Rule 6.7  
**Date:** Sunday, July 25, 2021 5:03:17 PM

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EXTERNAL

We support "The Sea Ranch Hosting Coalition" views which propose "...the introduction of reasonable performance standards, dictating how Short Term Rentals are operated responsibly, as proposed in the revised Sonoma County Local Coastal Plan (LCP, Program C-LU-1)."

We strongly oppose the views of The Sea Ranch Association Board proposed in their "Model Rule 6.7".

Don & Diane Rhett,  
The Sea Ranch Home Owners

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## COMMENT 13

**From:** [David Ross](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** The sea ranch housing coalition  
**Date:** Sunday, July 25, 2021 4:41:53 PM

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### EXTERNAL

My husband, Mark Housley, and I support the Sea Ranch Housing Coalition statement. We have rented homes at The Sea Ranch for 20 years with 7 of our closest friends. I hope others will have the same opportunity as we did for decades. We now own a house at TSR we dont rent however in the future, as we age, we might want to rent it for financial reasons. We bought with this in mind knowing we could rent it if needed.

Thanks,

David Ross and Mark Housley

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## COMMENT 14

**From:** [Francisco Saiz](#)  
**To:** [Scott Orr](#); [Chelsea Holup](#); [PRMD-LCP-Update](#); [Scott Hunsperger](#)  
**Subject:** Keep the Sea Ranch Open!  
**Date:** Saturday, July 24, 2021 2:45:04 PM

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### EXTERNAL

Twenty-five years ago, my wife and I started to bring our young family to Sea Ranch for vacation. We enjoyed the ride from El Dorado Hills (El Dorado County) through the Russian River valley and the coastal run from Jenner to The Sea Ranch. Even to this day we are still in awe of what Sonoma County and Mendocino County offer in terms of visual escape and short term rentals.

In the year 2004, we decided to buy a home in The Sea Ranch. Our realtor from Kennedy Associates knew all about the STRs (Short Term Rental) in The Sea Ranch. As we reviewed possible house choices, our Realtor talked about what homes were good investments in STRs. The STRs were not the primary reason for us to have a second home on the coast. We wanted a vacation place for our young family and to share with friends.

We became empty nesters in 2003. My wife wanted to be closer to her aging Mom in Marin County. We sold our home in El Dorado Hills and Forestville became our next home. Instead of a four hour drive to The Sea Ranch home from El Dorado Hills, our drive to enjoy The Sea Ranch became less than 2 hours.

Yes, we decided to place our Sea Ranch home on STR with Vacasa. We have a high degree of accountability for our Sea Ranch home via Vacasa and us by living rather close to The Sea Ranch. Between Vacasa and us, our second home is maintained at the highest level for our enjoyment and others. Our place in The Sea Ranch is very private and separated from other Sea Ranch homes.

Vacasa didn't operate our STR during the state and county request to shelter in place per health order. Vacasa did a wonderful job communicating their position to us during the pandemic period as to safeguarding their employees, guests, The Sea Ranch community and us.

My wife and I feel that by being in the STR, we are helping to maximize public access to the coast. Summer months are the busiest season for the coast, especially during the weekends and holidays.

Our Sea Ranch home contributes value to the surrounding area by using local companies: Tom's Plumbing, Pacific Woods Glass, Pro-West, Sea Ranch Supply, Baker's Supply, Gualala Building Supply, Trink's, Azul Cafe, Surf Market, Gualala Market, Ranch Cafe, Two Fish, Thai Garden and many others. I do feel that our 2nd home as a STR is a benefit to Northern California as we pay taxes to maintain local schools and health clinics.

The years of 2020 and 2021 were not typical of the normal rental pattern. There were significantly more rental requests as people could not travel out of the USA for other destinations like Hawaii, Canada, Mexico or Europe or even within the US due to pandemic restrictions. People decided to stay home and visit nearby destinations. The future years will probably not be like this and will revert to the normal flow of visitation for the area. The coastal area of Sonoma County and Mendocino County will always be a magnet for people on the move.

With the introduction of The Sea Ranch in 1964, options for vacations in Sonoma Coast has developed gradually into an economy based on tourism and recreation.

Sonoma County should not support or endorse the TSRA restrictions on STR nor should Sonoma County delegate STR performance standards or restrictions on The Sea Ranch to TSRA board. Any restrictions are inconsistent with the long history of TSR welcoming visitors from all walks of life.

Frank & Norma Saiz  
The Sea Ranch, CA

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## COMMENT 15

**From:** [Kyle Spain](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Local Coastal Planning Meeting Comments - 7/26/21  
**Date:** Sunday, July 25, 2021 5:37:54 PM

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### EXTERNAL

To Whom It May Concern,

As an owner of a house in Sea Ranch, which I rent on a short term basis, I am opposed to the current restrictions being suggested by the TSRA (The Sea Ranch Association):

- 1) Restrictions on whether or when I can rent my house.
- 2) There is no proliferation of short term rentals in Sea Ranch (short term rentals have been stable for over 15 years).
- 3) It is not fair or needed for the TSRA to oversee short term rentals to the degree they suggest and charge a yearly fee as well.

Most importantly there has been no analysis of the effects of the proposed restrictions. The TSRA has conducted no study, engaged no consultants, and offers no opinion on the expected impacts of the proposed restrictions.

More control/restrictions by TSRA will not make short term rentals better. They will only make things more complicated for all owners while not fixing "problems" that do not exist in the first place.

Thanks for your time,

Kyle Spain  
37067 Schooner Dr.  
The Sea Ranch

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COMMENT 16

**From:** Eric Staten  
**To:** PRMD-LCP-Update  
**Subject:** Short Term Rental Regulations - The Sea Ranch - OPPOSE  
**Date:** Sunday, July 25, 2021 9:00:05 PM

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EXTERNAL

To whom it may concern:

I am the owner with my husband, Rhodes Klement, of the house at 176 Sounding in The Sea Ranch.

I am writing to express my strong opposition to the proposed rule change that would severely restrict vacation rentals at my property.

I am extremely unhappy with the underhanded and secretive manner in which this item has been brought to the Sonoma County Planning Commission by the Board of TSRA.

TSRA convened a Short Term Rental Task Force to study the issue of short term rentals in TSR and make recommendations to the Board. The Board has chosen to ignore the recommendations of the Task Force, and without the customary and required input from our community, has proposed additional regulations that are so restrictive they will have the effect of prohibiting Short Term Rentals for my property. These recommendations are coming to you without the input and agreement of the community TSRA Board is purported to represent.

My husband and I are not rich; we would not be able to afford owning property in TSR without the benefit of rental income. We list our house with a local agency, Sea Ranch Escape, and have been doing so without complaint from our neighbors since 2018.

I urge you to vote NO on the proposed rule, and send it back to TSRA so that it can go through the necessary and required public process.

Further details on the impact of the proposed regulations, and the shoddy manner in which they have been advanced, can be found [here](#)

Yours sincerely,

Eric Staten  
176 Sounding  
The Sea Ranch, CA 95497

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**From:** Dennis Styne  
**To:** PRMD-LCP-Update  
**Subject:** Short term rentals at The Sea Ranch  
**Date:** Sunday, July 25, 2021 8:18:39 PM

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COMMENT 17

EXTERNAL

**Long ago in the late 70s we fell in love with Sea Ranch by renting a cabin. How delightful to experience Sea Ranch with our small child in spite of having limited financial resources at that time. More recently, 20 years ago, we were able to buy a cabin which were meant to be the least expensive houses in Sea Ranch. We are pleased now to allow another family in our situation (at that time) to rent it at one of the lowest rental prices in Sea Ranch so that others can take advantage of the wonder that we felt so many years ago. We don't understand how anyone can eliminate this experience from future renters by limiting access to Sea Ranch to only those who can afford to buy expensive houses. If you were to eliminate short term rentals the only lodging available will be at the Sea Ranch Lodge which is limited to 19 rooms.**

**Thank you for your consideration.**

Dennis Styne

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**From:** [Lynne Teismann](#)  
**To:** [Scott Orr](#)  
**Cc:** [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Subject:** Planning Commission Meeting on July 26, 2021  
**Date:** Sunday, July 25, 2021 9:43:00 AM

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EXTERNAL

Dear all:

Since the beginning of Sea Ranch there has always been the opportunity for owners to rent their house to others to enjoy the beauty of Sea Ranch and neighboring towns.

There has never been a need for restrictions to this in the past nor is there at this time.

Like any neighborhood there are a few homes that have on occasion had guests that were too noisy. As a result it is that owners responsibility to deal with the issue or if necessary we have our own security that will deal with it.

There is no factual evidence that anything has changed from the past that indicates problems specifically due to guests we invite to enjoy Sea Ranch.

Since we have managed these issues internally there is no need for new governmental policies or enforcement.

It is the responsibility of our community to manage what happens with our rental guests without involving a governmental agency at this time due to the lack of evidence suggesting a significant change is needed.

Our Sea Ranch community as a whole did not ask for this issue to be brought to you but only the board members. They only made this decision WITHOUT the vote from all Sea Ranchers and as a result have not provided you with accurate data.

I do hope you consider these data pieces during your meeting and hope you recommend that the TSRA board work more closely with its members to resolve its own issues as it has for many many years.

Thank you all for the work you do.

Sincerely  
Lynne Teismann  
(I do welcome guests to stay at my sea ranch home)

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# The Sea Ranch Hosting Coalition

## Supplement to Submission to Sonoma County Planning Commission on the Local Coastal Plan

July 26 2021

This supplement to our submission made on 7/16/21 is provided to update the list of supporters making this submission and provide some individual comments we have received on this issue.

### Updated supporter list

*Listed below are 194 people supporting this submission, mostly Sea Ranch homeowners who rent their homes.*

Samir Aboulhouda	Rodger Hogan	Karen Reis
Lisa Amador	Rich Holmer	John Reis
Trini Amador	Wanda Holmer	Sarah Reynolds
Dawn Ambuhl	Hawley Holmes	William (Billy) Riggs
Dan Ambuhl	Marina Hsieh	Karen Robbins
Montgomery Anderson	Carolyn Hsu	Claire Rose
Jon Arneson	Nancy Huff	Nate Rosenthal
Lyle Bentley	Amy Ihde	Ivy Ross
Lisa Bentley	Joseph Jacobs	David Ross
Marc Berg	John Kamola	Elisabeth Ryzen
Robert Blew	Nina Katz	Danette Sadle-Glass
Joanne Bovee	Shaheen Kazi	Frank Saiz
Edwin Bovill	Chris Kenber	Norma Saiz
Mark Briner	Kaethy Kennedy	sanjay Sakhuja
Kathy Britt	Janice Kesterson	Suzanne Samson
Jeannie Brooks	Jon Kesterson	Tamir Scheinok
Keith Brown	Janet MacKinnon	Patricia Scott
Cari Cadwell-Faso	Kevin Heston	Elizabeth Seaton
Charlotte Cardey	Jean Kirsch	Sean SeLegue
Paul Carter	Rhodes Klement	Linda Shaltz

Brian Chae	Wendy Kosanovich	Jennifer Shaw
Willa Chalmers	Nadine Kossick	Henry Shaw
Craig Chalmers	Danette Krueger	Sarah Shere
Pauline Chew	Kimberley Lakes	Benjamin Sloan
Steve Chinchio	Brian Land	Amy Smith
Peter Cole	Julia & Paul Leaver	Gordon Soares
James Cook	Greg Lee	Kyle Spain
Gardner Cook	W. Byron Levy	Phyllis Stanin
Lindsey Couchman	Catherine Levy	Fred Stanin
Anne Coughlin	Claire Lewis	Robert Stark
Shayne Cox	Gregory Li	Eric Staten
Athena Craig	David Lichtman	Rebecca Steffensrud Marshall
Bryan Craig	Damien Lombardo	Dennis Steindorf
James Curley	Jonathan Lowell	Arnold Steinman
Terry Cutler	William Mabry	Susan Steinman
Bill Cutler	Elizabeth Magee	William Stephens
Kelli D	Janet Maineri	John Taylor
Peter DeMarais	Jorge Martinez	Lynne Teismann
Sarah Deweese	Monica Martinez	Beverly Thayer
Chad DeWitt	Donna Martinez	Doug Thompson
Dawn Dolan	Doug Mason	Marilyn Thompson
Mike Doran	John Matthes	Lars Thorsen
John Dynia	Kathy McClelland	Kate Trompetter
Kathleen Elbasani	Philip Mercado	Trina Turk
Kathy Elbasani	Nirmal Merchant	Markus Urstoeger
Deborah Eppstein	Mary Lynn Miller	Antonia Van Becker
Kurt Fuchs	Ann Monette	Cheri Varnum
Kurt Fuchs	Jacquelyn Moorad	Magesh Venkat
Kevin Fukuda	Michael Morgan	Robert Vincent
Bob Gallagher	Paul Mundy	Nick Viku
Alicia Ginn	Sibyl Myers	Gideon Wald
Naomi Glass	Erin Myers	Mark Watson

Miju Han	Glenn Nakazawa	Nick Weidenfeld
Eric Hanson	Derek Norman	Sharon Weinstein
Krista Hanson	Randy Otte	Eugene Weiss
Leslie Harbaugh	Peggy Phister	Jill Wennmaker
Gundi Heinemann	Paul Plakos	Vern Wennmaker
Klaus Heinemann	Lynne Potter	Molly White
Karen Helmuth	Kathleen Prati	Cynthia White
Eileen Ho	Pamela Prentiss	Sarah Williams
	Todd Quinn	Clare Winterton
	Louis Rajczi	David Workman
	Gabriel Ramirez	Jay Yan
	Nadya Ramsaroop	Jean Yang
	Corinne Reichel	Judi Yeager
	Brent Reinke	Mitchell Zeemont
		Ralph Zimmermann

### *Individual comments*

*"My husband and I live in San Francisco and are in the process of buying a home at sea Ranch. This information about possible restrictions to the short term rentals is quite distressing and will force us to look elsewhere. Please do not add any restrictions." - Kathy Britt*

*"I rent my home as a short term rental and disagree with any further restriction placed on my ability to share my home with visitors to this fabulous location. It is a part of what allows me to remain a homeowner here." - Steve Chinchio*

*"I am a sea ranch owner who does not rent out my home, but want the opportunity to do so in future. This is important to me as I'm considering cutting back hours at work and will need another income source. I planned for this scenario when I purchased at sea ranch." - Karen Helmuth*

*"My wife and I join you all wholeheartedly. We were repeat renters, and then finally bought as part of our long-term retirement plan. Hosting short-term renters is the only way we can afford to keep our Sea Ranch home for retirement." - Wendy Kosanovich*

*"We are new Sea Ranch second home owners. While I don't rent my home out now, I want the option to remain there in the future." - Kimberly Lakes*

*"Thank you for this effort. My parents started at Sea Ranch in 1981 through short term rentals and we purchased our current home (which I have inherited) in 1986. It would not have been economically viable for my family without short term rentals, and that remains the case. Eliminating STR will further decrease the diversity of the TSRA ownership community to wealthy Bay Area patrons, a camp my family does not fall into." - Derek Norman*

*"The ethos of Sea Ranch is about accessibility, not elitism. Access to this coastal community should remain accessible to all and available for short term rentals (by all homeowners) which is the only way many can experience and afford to visit Sea Ranch and this part of the Sonoma coast." - Todd Quinn*

*"I am a resident of Sonoma County. I want to be able to vacation in my beautiful county by visiting short-term rentals at Sea Ranch and other locations. I am not in favor of increasing restrictions on short-term rentals. By and large, they represent a positive and joyful asset. However, I do appreciate that neighbors can be disturbed by unruly visitors, and this is where restrictions should be directed...not at limiting or eliminating the VR opportunity." - Karen Robbins*

*"I support the efforts of the Sea Ranch Hosting Coalition to ensure that short-term rentals continue into the future. While rental income was part of our original calculus when we bought our property six years ago, it is not the driving force today. Rather, we benefited as a family as renters long before we decided to buy. And we are so grateful to have the opportunity to let others share our second home and the extraordinary experience of the Sea Ranch, even when they don't have the financial capacity to be owners. If there's one thing I am vehemently opposed to, it is making the community any more exclusive, and any less diverse, than it already is. In fact, I would love to see Sea Ranch be even more inclusive and welcoming to renters and visitors of all types. Let's keep Sea Ranch open!" - Robert Stark*

*"Without the supplemental income from renting our Sea Ranch home, or if the restrictions are too extensive and prohibitive, we may have to sell. Our family has 5 generations that have spanned our Sea Ranch home ownership and we have always done part time, short term rentals to afford the expenses. We have rented other Sea Ranch homes on a short term basis many times, either because we needed more living space for large family gatherings, or when we were building our second Sea Ranch home after selling the original house that was owned by my wife's parents." - Greg Lee*

## COMMENT 20

**From:** [Amantha Walden](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** OPPOSITION TO TSRA BOARD'S "MODEL RULE 6.7"  
**Date:** Sunday, July 25, 2021 4:25:29 PM

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### EXTERNAL

To Whom It May Concern:

My husband and I are strong supporters of TSRHC. We bought a home in Sea Ranch in August of 2020 after renting houses there for 12 years. We finally were able to purchase our own place and have been restoring it since with hopes to be able to rent it out in 2022. We are residents of Los Angeles and plan to spend our summers there but were planning to offset costs by offering it as a beautiful, restored rental. These new rules will drastically effect those plans. Please see below as we stand with the TSRHC.

1. **We support reasonable performance standards** -- indeed we already exceed them and have done so for decades.
2. We provide public access to the Sonoma coast to a diverse range of visitors, supporting the local tourism economy and generating tax revenue for the County.
3. The County of Sonoma **should not support or endorse the TSRA Board's "Model Rule 6.7"** or other restrictions on Short Term Rentals at The Sea Ranch, as seen within the [Sonoma County Local Coastal Plan Update Policy Option: Vacation Rentals:](#)
  - (1) **Limits on the total number of vacation rentals** allowed within certain areas (e.g., by neighborhood, by communitywide ratio, etc.).
  - (2) **Limits on the types of housing** that can be used as a vacation rental (e.g., disallowing vacation rentals in affordable housing contexts, etc.).
  - (3) **Limits on maximum vacation rental occupancies.**
  - (4) **Limits on the amount of time a residential unit can be used** as a vacation rental during a given time period.
4. The County of Sonoma **should not delegate short-term rental performance standards or restrictions on The Sea Ranch to the TSRA Board.**
5. We oppose restrictions on whether and when owners may rent their properties

6. Policy Option: Vacation Rentals

We do hope you will reconsider these drastic standards and allow people to continue to rent out their homes in Sea Ranch. It is a thriving rental community and that is a large part of beauty of the Sea Ranch and the original goals set forth.

Sincerely,  
Amantha Walden

Sent from me to you.

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COMMENT 21

**From:** [Eugene Weiss](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Sea Ranch Short Term Rental Restrictions  
**Date:** Saturday, July 24, 2021 2:20:28 PM

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EXTERNAL

To whom it may concern,

I'm writing to oppose the proposed restrictions on short term rentals at Sea Ranch. I participated in most of the public meetings of the Sea Ranch Short Term Rental Task Force, and I can testify that the proposed restrictions are very far from the consensus views either of the task force members or of the public comments made at the meetings, both of which favored measures to prevent problems at a handful of problem properties, but which otherwise were generally favorable about the impact of short term rentals at Sea Ranch.

The proposed restrictions don't seem to have anything to do with the study conducted, I'm flummoxed as to why the Sea Ranch board of directors endorsed them. I would urge you not to rush these through, but rather to permit time for further study and discussion.

Thanks,

Eugene Weiss

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**From:** Susan Zetzer  
**To:** PRMD-LCP-Update  
**Subject:** Sonoma Coast Local Planning Commission July 26 meeting  
**Date:** Sunday, July 25, 2021 8:23:28 PM

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EXTERNAL

Hello, Gary

First, thank you for your service on the planning commission. I am a very proud owner of a property in Sea Ranch since 2014 and have had a positive experience renting out my property at 63 Clippers Reach. As I am still working full time, it won't be possible for me to attend the planning commission meeting on July 26; however, I did want to provide input on the TSRA "Model Rule 6.7".

I take my obligations as a property owner and a good neighbor very seriously. This means that I use a very well respected property management company, Beach Rentals in Gualala, to ensure compliance with current guidelines and to handle any issues that could arise. The property has had short term rentals since 2014 and we have not had any complaints or concerns from neighbors. As I am earning modest income from the rentals, I can handle the improvements and repairs that are needed, including the removal of dead and dying trees from my lot that borders a Sonoma county trail and creek and the replanting of native trees and shrubs to protect from erosion, with TSRA approval. (No small financial matter over the last few years). The income allows me to support the RCMS, the volunteer fire department and other local organizations that augment our county services.

For your meeting tomorrow:

- 1) I fully support reasonable and appropriate performance standards.
- 2) I fully support public access to the Sonoma Coast and that is one of the reasons I purchased a home in the Sea Ranch.
- 3) I do not support limitations on the number of rentals or the proximity of rentals to one another. This rule will limit new property owners to those who can afford to buy a property AND do not rely on supplemental income from short term rentals.
- 4) The TSRA is a respected association; however, I do disagree with their approach on the matters relative to short term rentals. The costs associated with monitoring and enforcing their suggested guidelines would be significant both for TSRA members and for Sonoma County. Based on the data provided by TSRA and their studies to date, there are only a very few properties that violate the current guidelines. Enforcement of current guidelines should address the violations and I do not support the new, restrictive guidelines.

Thank you in advance for your consideration of my perspectives on this important matter.

Kind regards,  
Susan Zetzer  
63 Clippers Reach, Lot 17-0-05  
The Sea Ranch  
Sonoma County

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Fred Allebach  
Sonoma  
7/17/21  
Local Coastal Plan public comments

My only comments are on the Public Access Element.

**Policy C-PA-3g**

Lower-fee camping access/ low-cost camping accommodations are very important in an era of extreme social inequity. The coast can't just be for the rich and wealthy. Please ensure that low-cost camping opportunities are set aside and maintained.

The camping reservation system, for both county and state camping facilities has added a layer of difficulty for equitable public access. More walk-ins and spots held for same-day spots should be offered. What has happened now is that you go to find a spot and they are all reserved for months at a time.

This farming out of reservations to low-cost companies who are not even from around here affects public access by favoring the privileged. Consideration should be given to going back to the old reservation system, with on-site personnel. Give real people real jobs, stop the automation.

If the state is flush with \$76 billion after Covid-19, spend some on restoring all the great features that were gradually taken away over the last 20 years.

**Policy C-PA-4d**

**Program C-PA-1**

Policy C-PA-4d says: "Maintain and provide free parking, subject to reasonable restrictions, at all public access points on the coast which do not contain special facilities in excess of restrooms, parking, gated access, trash enclosures, informational kiosks, and other minor amenities. If user fees are implemented for any coastal park areas, encourage discounts to County residents."

For both Policy C-PA-4d and Program C-PA-1 of the Public Access Element, I in the strongest terms support free parking access everywhere it is offered now. Absolutely NO user fees should be implemented to county access areas. This whole document goes on and on about not restricting public access. The worst thing the county could ever do would be to put a paywall on coastal access. NO FEES for parking or access!!!!!!!!!!!!!!!!!!!!!!

The demonstrable and objective county housing crisis underlines that the lower area median income cohort here is being heavily squeezed by high cost of living, inflation and gentrification. Parking fees and coastal access fees are one more nail in the coffin for equitable coastal access for poor people.

## COMMENT 24

The implementation of county access and parking fees should be expressly prohibited in the Local Coastal Plan, now and in the future; no weasel word phrases that allow parking and access fees. Just do it, prohibit all county parking and access fees except for camping.

<https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Local-Coastal-Program/Public-Review-Draft/#factsheets>

Fred Allebach  
Sonoma  
7/18/21

**Local Coastal Plan, additional public comments**

The Sonoma County coast is a tremendous and special natural and public resource to which free parking and no-cost/ low-cost public access should be fully protected and preserved. I made previous comments strongly supporting free parking in perpetuity, Policies C-PA-4d and Program C-PA-1, and supporting low-cost camping accommodations, Policy C-PA-3h.

In addition, I strongly support Policy C-PA-2f: "Provide low cost overnight camping and lodging facilities at periodic intervals along the California Coastal Trail corridor to support long term hiking and bicycling excursions. (NEW)"

-Low cost should be \$20 or less, not more than \$30.

I also strongly support Program C-PA-XX: "Evaluate feasibility of providing bus shuttle service from inland areas to popular coastal destinations. (NEW)"

-While Sonoma County's spread out geography and generally poor rural transit service and long headways almost demand residents have a car, a linked coastal shuttle service from Roseland in Santa Rosa and the Springs in Sonoma Valley, would target areas of known low-income residency where families may not own cars.

-For the shuttle, target low-income areas with Census designated DACs (disadvantaged communities). Roseland and the Springs are high DAC areas.

**General comments on the Plan:**

-Discourage or ban vehicles on the beach except for emergency purposes. Tire tracks on the beach (Salmon Creek/ Bodega Dunes) cheapen the natural experience and create a "trammeled" feel that people going to nature for inspiration are seeking to escape.

-Avoid over-development and keep things simple.

-Don't let homes and commercial development encroach on areas where there are few or none now.

-Create free or low-cost designated fire evacuation camping areas so county residents will have a place to go with a sea breeze to get fresh air during fire and smoke emergencies. All you need is a flat area for tents or RV rigs, water, and portable toilets. Allow temporary tent camping on the beach out of Bodega Dunes and Salmon Creek. In the western US, there is nowhere to go inland to escape fire and smoke; the coast is natural haven. My family went to Lawson's Landing in 2017, and it was great, but they no longer offer that free service. Doran Beach, Bodega Harbor, Bodega Dunes, Wright's Beach, Salt Point, Gualala could all be repurposed for emergency fire evac camping.

## COMMENT 25

-Ban drones.

-Dedicate more funds to keep up signage to protect nesting wildlife and resting sea mammals.

-Dedicate more funds to take out invasive pampas grass.

-Put a guard rail on the road up to Bodega Head, or at least a sign noting a dangerous shoulder drop-off.

-Improve signage from the Gualala campground out to the coast, current signage and maps are vague and don't let the public know what's coming.

**From:** [Kimberly Burr](#)  
**To:** [PRMD-LCP-Update](#)  
**Cc:** [Sean McNeil](#); [rick.rogers@noaa.gov](mailto:rick.rogers@noaa.gov); [Maxfield](#); [Matt St. John](#); [Bob Coey - NOAA Federal](#); [Hansen](#); [Caryl.Hart@coastal.ca.gov](mailto:Caryl.Hart@coastal.ca.gov)  
**Subject:** Comments LCP update 2021  
**Date:** Friday, July 16, 2021 10:09:42 PM

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## EXTERNAL

Dear Gary. Thank you for all your hard work on the LCP. It is my understanding that comments that I submitted on ESHA are in the Administrative record, however recently I was made aware that perhaps they are not. There was a previous effort on the LCP update and now there is another effort preparing an updated LCP for Sonoma county. I want all my comments to be in the record for this process. Please bring them forward and make them a part of the official record.

The habitat must be generous and take into account that the coastal areas are some of the only places many species can survive. Individuals of a species must be protected and their habitat but that is not enough. The Local coastal Plan must acknowledge the realities of biology, habitat loss, climate change, etc in order to properly protect what is left to us.

My concerns are that the draft ESHA designations are too limited. We are forcing species to migrate due to climate change and development. The ESHA to date is too small for the habitat needs of plant and animal species. Recovery planning by agencies and critical habitat designated species including room for migration due to climate change must be considered ESHA. To date I do not see that my comments have been addressed.

Thank you for ensuring that my all my comments on this process are captured rather than having public comments arbitrarily lost in the different phases of this update.

No project or activity specific surveys or opinions at a later date will suffice to define habitat considered ESHA. That is to continue the improper segmentation for which unfortunately Sonoma county is famous. Proper and generous (given the margin of error we must build in) designation of ESHA now based on best available science must occur now. Thank you again for your kind attention and important work.

Kimberly Burr

Sent from my iPhone

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**From:** [Pettis, Kelsey@DOT](mailto:Pettis.Kelsey@DOT)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Jenner Beach Focused Vulnerability Assessment (2016)  
**Date:** Wednesday, June 23, 2021 2:22:02 PM

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Hi,

My name is Kelsey Pettis, and I am an Associate Transportation Planner for Caltrans District 4. The System Planning Branch is working on finishing the SR 1 North Transportation Concept Report (TCR). The document will include Sonoma County's LCP. I noticed that there was a separate vulnerability assessment completed for Bodega Bay and was curious if the vulnerability assessment for Jenner was completed. I searched the county website but could not find it. If the Jenner Vulnerability Assessment was completed, can you please send me a copy or the link. We would like to include this information in the TCR.

Thank you,

-Kelsey Pettis

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**COMMENTS - LOCAL COASTAL PLAN REVISION 6/2021****From: Sonoma County Coalition of Hosts****July 2, 2021**

We commend Permit Sonoma staff and the county for their multi-year effort in completing the Local Coastal Plan draft and updating the prior LCP in so many important areas.

As a group of homeowners who rent or host their homes in Sonoma County and to coastal visitors on a short-term basis we were especially interested in the Land Use Element – Implementation Programs – Program C-CU-1 to establish performance standards for the use of existing residences for vacation rentals and hosted rentals. We look forward to the proposed performance standards and any public workshop that may be held to discuss them.

We have reviewed and are aware of the existing inland VR Ordinance and Special Use Standards for Hosted Rentals. We look forward in working with you in the preparation of performance standards that include coastal zone homes. We ask that you make clear that short-term renting or hosting our homes is still a residential use of our homes.

**Short Term Rental Owners/Hosts Provide Public Coastal Access**

Our vacation rental (VR) owners and hosts want to operate responsibly and continue to open our homes to the public by providing affordable accommodations to many Californians who would otherwise not be able to stay overnight on the coast. The revised LCP noted there are 374 hotel/motel rooms on the Sonoma County coastal zone. This is a small number of overnight facilities for a 55 miles long coastal area.

The coastal VR/short-term rentals and hosts add so many more tourist overnight facilities to these few hotel/motel rooms. They have done this for decades. These owners have been a part of the fabric of our coastal communities and have done much to ensure the public's access to the coast.

Many of the VR owners/hosts are “mom & pop” owner/hosts – some even “mom” only - who are doing their best to keep their homes, pay off their mortgages, and be part of the communities they have enjoyed for years. It is a win-win for the county and the Coastal Commission that so many of us are willing to share our homes with the public.

Most whole-house short-term rental (STR) properties are someone's home that is being rented out when they are not able to be there. The ability to earn short term income on the property is what makes that ownership affordable for them. Otherwise they may not be able to afford the home which may be their dream home where they plan to live in retirement or leave to their grandkids.

Coastal VR owners and hosts come in many versions but one thing is for sure: nearly all VR owners have only one coastal home and they work hard to keep it and share it with the public. They may have bought it for future residency on the coast. For retirees, pensions are becoming a thing of the past and owning a vacation rental home is not only a way to make ends meet, it's a retirement nest egg. These coastal owners may have inherited it from their family, or are folks who live and work in the bay area and cannot afford a home there but want to begin building equity themselves (and enjoy a weekend at the coast when they can) while continuing to work/rent down south.

Without the option to earn extra income through flexible short term rentals, siblings might have to sell the inherited family home, divorced or widowed mothers may not be able to maintain the coastal home. Only the uber-rich who can afford to maintain a vacant second home during their own absences will be purchasing. In this scenario many lovely coastal homes will be vacant and the public will truly suffer.

Most short term rental properties are someone's 2d home, or with bay area renters – their *only* home. These individuals may have hopes of retiring and living in it permanently one day, but while working they can't afford two homes, two mortgages, two insurance policies, or pay taxes on two properties. The only way average folks can retain use and still afford a retirement home is to offer it short term until they pay off the property in many years – at which time they can retire and live permanently in their coastal home.

The Sonoma Coast VR owners/hosts easily double the number of overnight tourist facilities in the coastal zone. There will not always be owners who choose to open their home to the public. The availability of VR homes will wax and wane depending on the price of the homes and who buys them. It is difficult to mandate that people live in their homes permanently or rent their homes long-term. This is often a personal decision based on family needs and personal preference. There may be a time when few coastal owners want to rent their homes short term – that will be a loss for the public seeking low cost, affordable overnight rentals.

### **Comments – Short Term Rental Restrictions**

Allow Coastal Zone homeowners the option to choose how they wish to purpose their home, and don't prohibit lower cost housing from being used as a vacation rental, as the cost of other properties that are higher value, will ultimately make it too expensive for low to moderate income families to enjoy the Coastal Zone. This will help ensure maximum public access, because without lower cost visitor serving facilities, members of the public with low or moderate incomes would be more limited in their ability to access and enjoy the coast. **Creating an ordinance that only allows wealthy homes to be used as vacation rentals, only allows the wealthy to stay in Sonoma County.**

Hosted rentals allow anyone to use a portion of their home, for additional, flexible income. This extra income helps people make ends meet or meet their goals. Restricting hosted rentals to only 1 room limits not only the homeowner, but the supply of affordable accommodations to low or moderate income individuals. **Allow hosted**

**rentals the option to purpose more than 1 room short-term, so affordable accommodations can be available to singles, couples, and low or moderate income visitors.** This will help ensure maximum public access, by providing lower cost visitor facilities, so all members of the public can enjoy the coast. Food Service, if provided, could be “grab” and “go” items as in budget hotels/motels, so there is a distinction from B&B’s.

**Accessory Dwelling Units that are offered short term would allow public access along the Sonoma Coast by offering affordable accommodations to lower and middle income individuals and families, as they are often less expensive than equivalent lodging in a hotel.**

- Short-term rental use of ADU/JADU units offer property owners much more flexibility in how their property is being used.
- Units can be used by adult children or other family members who have short-term need of housing (school breaks, job change, visiting family).
- Units can easily be converted to full-time rentals or any other use, as the owner sees fit depending on family needs.

## **Comments – Additional Points**

We agree with Permit Sonoma that a better way to regulate STRs is to limit the number of permits one owner can be issued. This is recommended over density limits and proximity limits – especially on the coast where so many homes are not occupied by permanent residents, and the population is about 3500.

- All existing STR homes should be grandfathered in when the coast is regulated
- There should be a maximum of 3 permits allowed for an owner
- Corporations should not be issued permits for STRs

This would be fair to Coastal Zone owners, a boon to the California public seeking coastal access, and allow private individuals the option to purpose a home short term.

## **Conclusion**

We ask that the county not place restrictions on vacation rental or hosting in the Coastal Zone. We can work with performance standards. That can be an enhancement for the public and our communities. But placing density caps, proximity limits, and other restrictions on vacation rental homes negatively affects average folks. In their time of need, will a permit even be available for them? One never knows when some unexpected event will happen (i.e. loss of a job, care of a loved one, divorce or death of a spouse) and they find themselves needing to earn extra income – offering a home short-term could be the only way to make ends meet. Please do not close the doors on us and create obstacles to our way of life.

Thank you for the opportunity to share our thoughts.

**From:** [Lance Coletto](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Subject:** Proposed Model Rule 6.7  
**Date:** Monday, July 19, 2021 11:57:37 AM

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**EXTERNAL**

I am writing to express my opposition to the Model Rule 6.7 that would limit short-term rentals at The Sea Ranch.

As a native of the Bay Area, life-long visitor to Sonoma Coast and, in the past 15 years, The Sea Ranch, I am grateful to the owners who have chosen to open their homes and share this precious place with those who could not otherwise experience the beauty of staying at The Sea Ranch (the lodge is wonderful, but does not compare with the many homes we have enjoyed).

As a guest, my family and I have always been respectful of the land and especially respectful of other inhabitants and their privacy. We have made countless memories and it would be a shame to curtail the ability of others to do so as well.

I urge you to oppose the rules that would severely curtail the ability of families to experience all that the Sonoma Coast has to offer and impinge on the rights of existing homeowners.

Sincerely,

Lance Coletto

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**From:** [Chelsea Holup](#)  
**To:** [Gary Helfrich](#); [PRMD-LCP-Update](#)  
**Subject:** FW: Vacation Rentals (Public comment)  
**Date:** Monday, July 19, 2021 10:47:10 AM

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COMMENT 30

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**From:** Pamela Greenhalgh <[pgreenhalghccc@gmail.com](mailto:pgreenhalghccc@gmail.com)>  
**Sent:** July 19, 2021 10:46 AM  
**To:** Chelsea Holup <[Chelsea.Holup@sonoma-county.org](mailto:Chelsea.Holup@sonoma-county.org)>  
**Subject:** Vacation Rentals

Dear Ms. Holup,

I stand with the Sea Ranch owners who use their homes for vacation rentals. I am one of those renters. I come as often as I can, from Southern California. Please do not make it more difficult for them to continue as they do now. I stand with them and I reiterate their comments to you:

The County of Sonoma should not support or endorse the TSRA Board's Model Rule 6.7 or other restrictions on Short Term Rentals at The Sea Ranch, nor should it delegate short term rental performance standards or restrictions on The Sea Ranch to the TSRA Board. Such restrictions are inconsistent with the long history of The Sea Ranch welcoming visitors from all walks of life, and with TSRA CC&Rs. They are not supported by TSRA members, not based on credible studies or facts and are very damaging both to public access and to owners who rent their home on a short term basis.

I support reasonable performance standards -- indeed we already exceed them and have done so for decades. We look forward to working with the County of Sonoma on establishing reasonable short term rental performance standards through the LCP.

Thank you.

[\(714\) 403-5586 cell](tel:(714)403-5586)

*"Alone we can do so little. Together we can do so much." Helen Keller*

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**From:** [Chelsea Holup](#)  
**To:** [Gary Helfrich](#)  
**Subject:** FW: The Sea Ranch Hosting Coalition, Submission to Sonoma County Local Coastal Plan July 26 2021 (Public Comment)  
**Date:** Monday, July 19, 2021 8:38:55 AM  
**Attachments:** [page2image2079699264.png](#)  
[page2image2079768544.png](#)  
[page5image2019333920.png](#)  
[page7image2080237520.png](#)

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## COMMENT 31

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**From:** Eileen Ho <[eileenho05@gmail.com](mailto:eileenho05@gmail.com)>  
**Sent:** July 16, 2021 8:35 PM  
**To:** Chelsea Holup <[Chelsea.Holup@sonoma-county.org](mailto:Chelsea.Holup@sonoma-county.org)>  
**Subject:** The Sea Ranch Hosting Coalition, Submission to Sonoma County Local Coastal Plan July 26 2021

Dear Ms Holup,  
For your consideration.  
Thank you,  
Eileen Ho, The Sea Ranch Homeowner  
36804 Green Cove Drive  
The Sea Ranch, CA 94597

# The Sea Ranch Hosting Coalition

## Submission to Sonoma County Local Coastal Plan July 26 2021

### Summary

We are a coalition of property owners on The Sea Ranch who welcome renters to our homes responsibly on a short term basis. We provide public access to the Sonoma coast to a diverse range of visitors, supporting the local tourism economy and generating tax revenue for the County. Short term rentals have been part of The Sea Ranch since its founding and their numbers have not changed in the last 15 years [1].

We **support** the introduction of reasonable **performance standards** determining how Short Term Rentals are operated as proposed in the revised Local Coastal Plan (LCP, Program C-LU-1).

We **oppose restrictions** on whether and when owners may rent their properties, as proposed by The Sea Ranch Association (TSRA) Board in their "Model Rule 6.7" [10]. We present a detailed justification for this position in the attachment. In summary:

- • The Sea Ranch is not a residential community. 69% of the houses are second homes [2018 census] -- approximately 20% of houses are used as short term rentals.
- • The ability to rent a Sea Ranch home is a valuable asset. Its prohibition requires clear justification. None has been suggested.

- TSRA has done no studies, engaged no consultants and expressed no opinion on the effects of the proposed restrictions. This is irresponsible.
- • TSRA's own Short Term Rental Task Force did not recommend restrictions, citing a lack of data, evidence or necessity.
- • TSRA's proposed restrictions on Short Term Rentals in the coastal zone are beyond their authority, have not followed TSRA rules and are strongly opposed by TSRA members.
- • There has been no proliferation of short term rentals at TSR -- the number has remained stable for more than 15 years.
- • There has been tension between long term residents and renters for many years. Short term rental restrictions will not resolve this and represent a significant overreaction to a minor problem.
- • Short Term Rentals make a significant contribution to the local economy and Sonoma County tax revenue. Restrictions would reduce these contributions.
- • Increased utilization, if it occurs, is adequately addressed by performance standards.
- • Short Term Rentals at The Sea Ranch do not displace affordable long-term rental housing because at current real estate prices, no properties at The Sea Ranch would be available at an affordable long term rent.
- • There is no evidence of corporate ownership of rental homes at TSRA and it would not in any case be economically viable.
- • The Coastal Commission does not support restrictions on short term rentals unless there is significant proliferation -- none is taking place at the Sea Ranch.
- • Nuisance, whether caused by renters, second home owners or permanent residents, is not a significant issue at The Sea Ranch in part because its nuisance ordinances are already stronger than most Short Term Rentals performance standards.

## Conclusion

The County of Sonoma should not support or endorse the TSRA Board's Model Rule 6.7 or other restrictions on Short Term Rentals at The Sea Ranch, nor should it delegate short term rental performance standards or restrictions on The Sea Ranch to the TSRA Board. Such restrictions are inconsistent with the long history of The Sea Ranch welcoming visitors from all walks of life, and with TSRA CC&Rs. They are not supported by TSRA members, not based on credible studies or facts and are very damaging both to public access and to owners who rent their home on a short term basis.

We support reasonable performance standards -- indeed we already exceed them and have done so for decades. We look forward to working with the County of Sonoma on establishing reasonable short term rental performance standards through the LCP.

### **Attachment. DEFINITIONS**

**Restrictions** refers to regulations that would determine **whether** or **when** an owner can rent their home as a short term rental. **Performance standards** prescribe **how** a home may be rented.

**Proposed restrictions** by TSRA Board members in their "Model Rule 6.7" include:

- • A cap on the total number of STR properties at The Sea Ranch
- • A maximum of 180 days each year that a home can be rented
- A minimum distance of 300 ft between STR properties

**SHORT TERM RENTAL RESTRICTIONS ARE UNNECESSARY FOR THE SEA RANCH**

The largest category of TSRA properties is vacant 2<sup>nd</sup> homes, representing 69% of its housing units (2018 census). The Sea Ranch Association estimates [1, page 7d46] that 365 homes on the Sea Ranch (20% of the total) are Short-Term Rentals and that this percentage has been stable for 15 years. This number is consistent with the number of TOT permits reported by Sonoma County.

There are 1,134 people in 604 households (2018) permanently resident on the Sea Ranch. They are 92.9% white, <1% asian and 6.3% other races, older (median age of 66.1), highly educated (41.4% having a graduate or professional degree) and affluent (mean household income \$116,782) [2,3,4].

Since the large majority of Sea Ranch owners are white and wealthy, short term rentals represent the only realistic path to diversity. Short term rentals are relatively affordable, providing access to Sea Ranch's natural beauty and amenities for people who cannot yet afford to purchase a house.

The Sea Ranch demographics are changing as younger owners, some with children, are now buying, driven by the pandemic and the availability of a state of the art fiber optic network. This has also driven real estate prices up substantially. Over time this may reduce the proportion of permanent residents.

The Sea Ranch has been a popular vacation destination for short term renters since its founding. Many purchasers of Sea Ranch real estate begin as renters. In 2019, The Sea Ranch generated \$1.5 million of Transient Occupancy Tax revenue for Sonoma [1, 7d48] and over \$350,000 in voluntary contribution revenue to The Sea Ranch Association (6% of the Association's budget [5]) directly from short-term rentals.

With its high proportion of vacant second homes, The Sea Ranch is not primarily a residential community. TSRA has misstated the density of STRs at The Sea Ranch: In their report [1, page 7d28] a geographic image of the North 2 region of TSR purporting to show "high" density of STRs shows 20% of the lots<sup>1</sup> as STRs, slightly more than the long-term historic rate for the Sea Ranch. There are a few isolated streets with higher density, as chance would dictate. The Sea Ranch is not suffering a proliferation of Short Term Rentals, even at the North end.

The California Coastal Commission was established in part to protect public access to the coastal zone. Public access at The Sea Ranch consists mainly of access to affordable Short Term Rental accommodation and thereby access to the trails and coast along with specific public access to certain beaches.

Coastal Commission approval of some Local Coastal Plans that include restrictions on Short Term Rentals has only addressed communities that are different from The Sea Ranch, with higher population density, larger household sizes, more families, proximity to higher education institutions and fewer vacant units [6]. These communities also offer hotel accommodations providing alternative public access.

According to the Coastal Commission, restrictions on Short Term Rentals are appropriate in the Coastal Zone only where proliferation of STRs presents a genuine threat to the character of the community. This is not the case at The Sea Ranch as STRs have always been present at their current levels.

**LEASING IS EXPLICITLY ALLOWED IN THE SEA RANCH CC&R's AND is A VALUABLE ASSET TO HOMEOWNERS**

The Sea Ranch Common Covenants & Restrictions (CC&Rs) explicitly provide an exception to their restriction to residential use for "the leasing of any lot from time to time by



the Owner thereof” [7, 3.02(c)(3)]. Sonoma County also considers short term rental to be a “residential” activity with respect to Zoning ordinances. Removing or restricting this right would have a major impact on Sea Ranch owners who rent their homes and requires compelling justification. This is not provided either in the TSRA STR Task Force report or in Model Rule 6.7.

For many owners, renting their home on a short term basis is the controlling factor in enabling their purchase. It is what makes ownership affordable. For people who do not presently rent their home, the ability to do so is an asset that can protect them in a time of need.

Second generation owners who inherit their Sea Ranch home from their parents may only be able to afford to keep the home if they earn income from short term rentals. Only the very affluent, who can afford to maintain a vacant home during their own absences, will be able to purchase a home that cannot be rented due to the restrictions.

<sup>1</sup> Across the ranch, 20% of the lots are vacant, so it is more than 20% of the *properties* that are STRs.

Restrictions on short term rentals take this valuable asset away from homeowners. This can have a serious effect on a family’s finances, perhaps forcing a sale of the home.

### **THERE HAS BEEN NO STUDY OF THE PROPOSED RESTRICTIONS**

The TSRA Board has conducted no study, engaged no consultants and offered no opinion on the expected impacts of the proposed restrictions, either with respect to the supposed problems they will solve or to the financial impacts on members, the Association and public access to the coast. Specifically, the Board refuses to state whether they expect the restrictions to significantly reduce visitor numbers, despite repeated requests.

By failing to properly study the proposal or properly consult members, the TSRA Board has not acted in good faith. This is not an issue where the county should defer to the TSRA Board’s supposed authority or expertise since it lacks either.

### **TSRA’s OWN SHORT TERM RENTAL TASK FORCE DID NOT RECOMMEND RESTRICTIONS**

The TSRA Board established a Task Force to consider regulation of Short Term Rentals in the spring of 2019. The Task Force collected data and held several public meetings for member comments and produced a report in December 2020 [1] recommending the introduction of performance standards.

The Task Force explicitly considered the topic of restrictions and concluded that they would **not** include any restrictions in their proposal because:

*“(1) Not enough irrefutable data could be collected to support decisive recommendations, and (2) It is unclear if these more restrictive density policies will be necessary. Said differently, the TF hopes its initial set of recommendations will reduce STR problems to the point that some density limitation recommendations are not needed.” [1, page 7d26]*

(note that in the reference it is clear that “density policies” refers to all the types of restrictions now proposed in Model Rule 6.7)

Restrictions were subsequently added by the Board without further evidence, without study of the consequences, without substantive member consultation and in the face of strong opposition from members.

### **THE PROPOSALS OF THE TSRA BOARD DO NOT REPRESENT THE VIEWS OF MEMBERS AND ARE BEYOND THE AUTHORITY OF THE TSRA BOARD TO ADVOCATE**

Model Rule 6.7 has not been published for public comment as is required for a new TSRA Rule, or put to a vote of the members. Most TSRA members are unaware of this proposed

rule. Multiple board meetings have produced overwhelming objections from members present.

The TSRA Board lacks legal authority to lobby the county or Coastal Commission on behalf the

<sup>2</sup> Association because courts have made clear a HOA cannot limit STRs in the coastal zone

### **THERE IS NO PROLIFERATION OF SHORT TERM RENTAL PROPERTIES AT THE SEA RANCH**

The TSRA Board states as justification for their Model Rule 6.7: *As with many living systems, community is difficult to build, and easy to disrupt, even destroy. Sometimes, particular shifts and innovations occur that need fairly quick responses to prevent significant harm from occurring. Such is the case with the rise of online vacation rental platforms. These platforms have supported the commercialization and “hotel-ification” (sic) of residential communities across the nation. In these cases, **uncontrolled and unmanaged growth of STRs** has eroded people’s sense of safety and their connection to one another, and risks changing a community’s character in perpetuity.*

The TSRA Short Term Rental Task Force itself [1] identified that the number of Short Term Rental properties at The Sea Ranch has been stable at about 20% of properties for at least 15 years.

The Model Rule assumes that “*proliferation of STRs*” is the major cause for action but the evidence shows that there is no growth of STRs at The Sea Ranch. The TSRA Board cites “problems” that may exist elsewhere as justification for their proposed restrictions. These problems have not been demonstrated at The Sea Ranch - which has had hundreds of STRs since its inception and has welcomed generations of a diverse public to share in the beauty of the Sea Ranch.

### **TENSION BETWEEN HOME OWNING COMMUNITIES ON THE SEA RANCH**

There is a long history of tension between Sea Ranch residents and short term renters. During the Coastal Commission building moratorium in the late 1970s, a group of homeowners threatened to take the Commission to the Supreme Court to oppose their demand for public access to Sea Ranch beaches. The 1980 Bane Bill resolved the issue, providing public access to beaches as well as other very substantial changes to the Sea Ranch. These changes included a sharp reduction in the number of lots and the requirement to provide low-cost employee housing on the Sea Ranch.

<sup>2</sup> Lamden v. La Jolla Shores Clubdominium Homeowners Assn (1999)

Some residents object to the presence of short term renters and in particular their utilization of Sea Ranch amenities like the recreation centers. The voluntary contribution of 3.5% of rental revenue to the Sea Ranch by owners who rent, introduced in 1991, was an attempt to solve this problem. (The Sea Ranch as an HOA is not empowered under the Davis/Stirling act to levy taxes). In the recent past, former community manager Frank Bell, in response to a rising tide of complaints from residents, wrote in the Sea Ranch Bulletin that Sea Ranch was not originally designed for permanent residence and short term rentals were always an integral part of the founders’ vision, saying that renters have every right to be at the Sea Ranch.

Pressure to restrict short term rentals, evidenced in Model Rule 6.7, may be driven in part by this same dynamic. It is entirely understandable that some of these tensions exist. But long term restrictions on short term rentals proposed by Model Rule 6.7 are not the right way to fix the situation. The Sea Ranch is about to embark on the creation of a long term strategic plan. This is precisely the project within which these and other issues should be resolved.

### **SHORT TERM RENTALS MAKE A SIGNIFICANT CONTRIBUTION TO THE LOCAL**

## ECONOMY

<sup>3</sup>

With conservative assumptions, an average vacation rental home at The Sea Ranch contributes over \$30,000 per year directly to the local community. Across 365 homes, this is an annual contribution of well over \$10 million. This does not include non-essential improvements owners make to their homes that support local construction businesses. Significantly curtailing this revenue would seriously impact the local economy. There is already a shortage of critical local service providers. Any reduction in short term rentals and the consequent impact on ownership would make an already serious problem worse.

### **INCREASED UTILIZATION IS ADEQUATELY ADDRESSED BY PERFORMANCE STANDARDS**

The Sea Ranch Association Board claims there has been a significant increase in visitors in recent years [1]. Since the number of STR properties is not growing, this could only occur through increased utilization. They infer this increased utilization [1] from a one-off increase in Sonoma TOT revenue between 2017 and 2018, a 14% increase in number of rented nights per unit between 2016 and 2019<sup>4</sup> and an increase over time in TSRA 3.5% fee revenue (the latter is in line with inflation). This is hardly compelling.

Homeowners at Sea Ranch have, over five decades, made their homes available to vacation renters and have demonstrated admirable responsibility in ensuring that renters conform to Sea Ranch standards. Nuisance is caused by both second home and permanent residents as well as renters. There is no evidence that renters cause any more problems than other categories of owners. The Sea Ranch has an outstanding rental performance record.

<sup>3</sup> Average 40 x 3 day stays per home, \$500 guest spending per stay in local businesses, \$2,000/yr additional maintenance paid to local businesses, 3.5% TSR fee, Sea Ranch Connect and Sea Ranch Water company fees

<sup>4</sup> They include projected 2020 figures data published early in 2020, but this is hardly reliable due to the difficulty of projecting a seasonally varying metric and the COVID-19 pandemic.

The Sea Ranch has in place and has recently enhanced nuisance rules (for all members) that are already stronger than most STR performance standards. Where there have been specific issues, TSRA has not enforced the regulations that are already in place. According to TSRA Security there were **20** noise complaints [8] associated with short-term-rentals in 2018 - the year presented with the highest number - and **19** complaints associated with owners and others. This represents one noise complaint per rental home every 18 years. This was *before* the introduction of enhanced nuisance rules which appear to have caused a significant reduction in complaints.

This data suggests the situation is well under control with The Sea Ranch's nuisance rules (Rule 6.6), which are currently being even further enhanced.

### **SHORT TERM RENTALS DO NOT DISPLACE AFFORDABLE HOUSING AT THE SEA RANCH**

The Sea Ranch Association claims [10, 4a9], without evidence, that "*The proliferation of STRs has reduced the stock of housing available for long-term rentals. This has contributed to a housing crisis for moderate income and low income residents with employment in the region.*"

As noted above, there is no proliferation of STRs at The Sea Ranch, but the converse proposition that *reduction* in the number of STRs would *increase* availability of affordable long-term housing at The Sea Ranch is also simply not true.

None of the Sea Ranch homes now in the STR market would become housing options to fill that need, urgent as it is. A current Zillow search shows that no homes are available for sale on the Sea Ranch at less than \$1.1 million. Long-term rentals for these properties will not be "affordable".

The result of Short Term Rental restrictions will not be more affordable housing. It will be more vacant or For Sale homes and a resulting reduction in both house prices [12] and public access to the coast.

### **CORPORATE OWNERSHIP OF STRs HAS NOT OCCURRED AND IS ECONOMICALLY UNATTRACTIVE**

TSRA claims that there is a threat of individual or corporate investors descending on The Sea Ranch to purchase multiple homes for use as STRs. News reports of Marriott's marketing arrangement with Vacasa [13] have been wrongly characterized as such a threat.

This phenomenon has not been observed at The Sea Ranch. The economics of owning and renting an STR property purely for investment at The Sea Ranch are not at all favorable.

Allowing (generously) for \$50,000 gross annual income on a \$1MM property, after subtracting management fees (25%), property tax (~1% of property value), insurance (~\$4k), utilities and maintenance (~\$10k) and HOA fees (\$2.7k) the owner is left with less than \$10k. This is a 1% annual return on a \$1MM investment. This would not fund a loan. There is no credible case for investor ownership as a threat to TSR.

### **THE COASTAL COMMISSION FAVORS RESTRICTIONS ONLY IN THE CASE OF PROLIFERATION OF VACATION RENTALS**

The California Coastal Commission has stated [14]:

*... the Commission has **not** historically supported blanket vacation rental bans under the Coastal Act, and has found such programs in the past not to be consistent with the Coastal Act. In such cases the Commission has found that vacation rental prohibitions unduly limit public recreational access opportunities inconsistent with the Coastal Act. However, in situations where a community already provides an ample supply of vacation rentals and where **further proliferation of vacation rentals would impair community character or other coastal resources, restrictions may be appropriate**. In any case, we strongly support developing reasonable and balanced regulations that can be tailored to address the specific issues within your community to allow for vacation rentals, while providing appropriate regulation to ensure consistency with applicable laws.*

This is a broad statement applying to the entire California coastal zone. It is appropriate in densely populated communities with families, children, and a robust long-term rental housing community. None of that exists at The Sea Ranch where only 1,134 [2] full time residents reside. Only 38% of the homes here are occupied by owners, 15% are renter occupied, a large majority are "vacant" using Census terminology.

Restrictions on STRs will diminish the availability of affordable vacation accommodations in an important coastal zone and leave the beauty of the northern Sonoma County coast to be enjoyed by a small number (1,134) of entitled property owners.

As noted above, the evidence proves there is no proliferation of STR homes at The Sea Ranch. The proposed restrictions are not *tailored to address specific issues* as the Coastal Commission suggests.

### **CONCERNS ABOUT VISITOR BEHAVIOR ARE ADEQUATELY ADDRESSED BY PERFORMANCE STANDARDS AND NUISANCE ORDINANCES**

Current Sea Ranch owners who rent their properties on the STR market do so in a highly responsible manner. Overwhelmingly, short-term renters fit well into the Sea Ranch environment and cause few community issues. Very occasional nuisances are resolved in the field. Existing regulations on the Sea Ranch are perfectly adequate to deal with

occasional challenges -- but they are not being enforced. And these nuisances are not confined to short term renters. The head of Sea Ranch security states that there is no problem resolving the small number of nuisances that arise.

The Board of TSRA argues without evidence, that “*Without reasonable regulation, STRs allow conduct that damages the tranquility, safety, and beauty of coastal communities.*” [8, 4a9]. They claim online vacation platforms are ‘*causing commercialization and “hotel-ification” of residential communities*’.

The Sea Ranch has never been, and is not now, primarily a residential community.

The evidence is that there is no proliferation of STRs. The TSRA Board claims that *generic internet marketing* is resulting in an increasing number of visitors who do not evince the same respect for the natural environment and TSR’s strict rules as residents, or specifically Board members, expect. There is no evidence supporting this claim.

The TSRA Board appears to seek a reduction in visitors to the Sea Ranch without evidence or justification.

## References

- [1] Report of the Short Term Rental Task Force to The Sea Ranch Association Board on December 12, 2020 (<https://www.tsra.org/wp-content/uploads/2020/12/2020-12-12-TSRA-BOD-Reg-AgendaPkt-0a2-Full-r.pdf>, page 7d1).
- [2] <https://data.census.gov/cedsci/table?q=95497&tid=ACSSST5Y2019.S0601>
- [3] <https://data.census.gov/cedsci/table?q=95497&tid=ACSSST5Y2019.S1101>
- [4] <https://data.census.gov/cedsci/table?q=95497&tid=ACSSST5Y2019.S1901>
- [5] [https://www.tsra.org/wp-content/uploads/2019/11/2019-20-Adopted-Budget-TSRA-ID\\_5336.pdf](https://www.tsra.org/wp-content/uploads/2019/11/2019-20-Adopted-Budget-TSRA-ID_5336.pdf)
- [6] Comments on the Local Coastal Plan update submitted to the Planning Commission by Carmen Estrada, 3/25/2021 ([link](#))
- [7] [https://www.tsra.org/the-sea-ranch-restrictions-articles-2-3/#Article\\_III](https://www.tsra.org/the-sea-ranch-restrictions-articles-2-3/#Article_III)
- [8] <https://www.tsra.org/wp-content/uploads/2021/06/2021-06-26-TSRA-BOD-Reg-AgendaPkt-0a-Full.pdf>
- [9] TSRA Short Term Rental Task Force presentation 8/20/20, p20 <https://www.tsra.org/wp-content/uploads/2020/08/STRTF-August-8-2020-Meeting-8-24-corrected.pdf>
- [10] <https://www.tsra.org/wp-content/uploads/2021/06/2021-06-26-TSRA-BOD-Reg-AgendaPkt-0a-Full.pdf>, page 4a8
- [11] <https://ecms.newportbeachca.gov/Web/0/doc/2674168/Page1.aspx>
- [12] <https://www.sciencedirect.com/science/article/pii/S0094119021000383>
- [13] <https://www.vacasa.com/news/select-vacasa-homes-added-to-homes-villas-marriott-international> [14] <https://documents.coastal.ca.gov/reports/2018/4/w20a/w20a-4-2018-exhibits.pdf>

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**From:** [Nolan Hughes](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Map correction C-Pa-1 sub area 8  
**Date:** Friday, June 25, 2021 5:57:58 PM

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Hi, I noticed that the trailhead symbol for H-27 designated as follows : "SCSP: Willow Creek Coleman Valley Access" is on the wrong spot on your Map. It should be about a mile south west at the next corner of the Park property where Coleman Valley Rd intersects the Park land briefly. Your present location is not on a road and is on private property.

--

Regards,  
Nolan Hughes

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**From:** [Chelsea Holup](#)  
**To:** [Gary Helfrich](#); [Brian Oh](#)  
**Subject:** FW: The Sea Ranch short-term Rental rules (Public Comment)  
**Date:** Monday, July 19, 2021 8:15:31 AM

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-----Original Message-----

From: Robert Hutchinson <hutchinsonra@yahoo.com>  
Sent: July 18, 2021 3:47 PM  
To: Chelsea Holup <Chelsea.Holup@sonoma-county.org>  
Subject: The Sea Ranch short-term Rental rules

EXTERNAL

As an occasional visiting renter, I agree with the new rules being proposed by the Sea Ranch Association Board. I have reviewed the complaints (such as those from the Abalone Bay house which is a permanent short-term rental, newly renovated for that purpose) and find them shallow and in no way understanding the issues that full time and longer term residents of the Sea Ranch are clearly having and want to forestall. Please approve the new rules

Robert Hutchinson  
Boulder, Colorado

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**From:** [bizkeith@keithnavarro.us](mailto:bizkeith@keithnavarro.us)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Revised Public Review Draft - June 2021  
**Date:** Wednesday, June 23, 2021 6:36:37 AM

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EXTERNAL

Why is there tracking on the link to the draft plan? There is no reason I should be tracked to see a government plan.

- Keith

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**From:** [Jonathan Kesterson](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Cc:** [Janice Kesterson](#)  
**Subject:** Opposition to Restrictions on Short Term Rentals as part of the Revised Sonoma County Local Coastal Plan  
**Date:** Saturday, July 17, 2021 7:56:24 PM

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## EXTERNAL

Hello - as an owner of a Sea Ranch property since 1972, we wanted to voice our opinion in hopes you can make the right choice in this matter.

We strongly oppose restrictions on whether and when owners may rent their properties as proposed by The Sea Ranch Association (TSRA) Board in their "Model Rule 6.7". These restrictions include limits on the number of days a home can be rented, a reduction in the total number of rental homes and a minimum of 300ft between any two rental properties.

Some of the reasons are as follows:

- Restrictions on Short Term Rentals are unnecessary in the coastal zone. The California Coastal Commission has held that restrictions are justified only in cases of proliferation of short term rentals.
- The evidence indicates that there is no proliferation of Short Term Rentals at The Sea Ranch as the number has been stable for over 15 years.
- The Sea Ranch is and has always been a popular vacation destination – nearly every homeowner was once a renter.
- It is not fair that once they are homeowners that they lock the doors behind them.
- Renting a Sea Ranch home is a valuable asset that cannot be removed from the owner without strong justification. No such justification has been suggested.
- There has been no analysis of the effects of the proposed restrictions. TSRA has conducted no study, engaged no consultants and offers no opinion on the expected impacts of the proposed restrictions. This is irresponsible.
- TSRA's own Short Term Rental Task Force did not recommend restrictions, citing a lack of data, evidence or necessity.
- Short Term Rentals make a significant contribution to the local economy and Sonoma County tax revenue. Restrictions would reduce these contributions.
- Short Term Rentals at The Sea Ranch do not displace affordable long-term rental housing because at legacy real estate prices, no properties at The Sea Ranch would be available at an affordable long term rent.
- Nuisance, claimed by TSRA as justification for Short Term Rental restrictions, is not a significant issue at The Sea Ranch, in part because nuisance ordinances at The Sea Ranch are already stronger than most Short Term Rentals performance standards.

- “The Sea Ranch is not Tahoe” quoted by the Sea Ranch Security Head.

Thank you.

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**From:** [Susann Lucero](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Sea Ranch  
**Date:** Monday, July 19, 2021 6:48:51 AM

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**EXTERNAL**

As a renter in Sea Ranch once a year since it was built....you would be taking away the privilege of enjoying everything they offer and maintain with excellence. Rentals on the California coast ...and the coast should be open to the public !!! What gives you the right to take that happiness away from human beings ???--  
Susann Lucero

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**From:** [Mark](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** small error  
**Date:** Tuesday, June 22, 2021 6:21:13 PM

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COMMENT 37

**EXTERNAL**

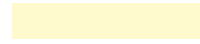
On the Fire Department map, the colors (or the labels for the colors) for Bodega Bay and Bodega are reversed.

**Mark**

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**From:** [Paul Newacheck](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Sea Ranch Rentals  
**Date:** Sunday, July 18, 2021 4:13:34 PM

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**I support** limits on Sea Ranch rental properties as proposed by The Sea Ranch Association (TSRA) Board in their “Model Rule 6.7”. These restrictions are intended to prevent a proliferation of rental properties and are consistent with the California Coastal Zone Commission.

Sincerely,

Paul Newacheck  
293 Grey Whale  
The Sea Ranch

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**From:** [Derek Norman](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Sonoma coastal access - short term rentals  
**Date:** Saturday, July 17, 2021 6:21:10 AM

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Sonoma County Planning Department,

I am a homeowner at Sea Ranch - my family has owned the home since 1986 and I inherited the home two years ago. I have learned the TSRA Board is submitting comments on short term rentals that are not reflective of Sea Ranch's diverse community of owners.

I strongly support continuing the status quo for short term rentals at Sea Ranch. There is nothing broken about the system. In my 36 years I have never had an issue with a short term renter, and I have never heard of a complaint about one. Sea Ranch is a calm and isolated place, and it attracts people who like that style.

Putting further restrictions on short term rentals is effectively an economic "taking". It should only be done to mitigate a significant downside, of which there is no concrete evidence other than hearsay. The main complaints tend to come from full time residents who represent a minority of the Sea Ranch community. They signed up and moved to a community where short term rentals were the status quo. Now they are in a place of power and would like to change it. But that is unfair, and not right.

Restricting STR will further decrease the community diversity at Sea Ranch. It will be less directly accessible to renters who likely represent a more diverse socioeconomic background. It also decreases ownership diversity by placing restrictions on how owners may finance the ownership of their property. Whether or not it is an ulterior motive, full time residents and long term renters shouldn't have a monopoly on enjoying the Sonoma coastline. STR in fact remains a crucial accessibility tool for tourists outside Sonoma to come and enjoy its coast. Isn't an underlying principle of California coastal property that it is highly accessible? Do you want to be complicit in changing this norm?

Thank you for hearing my message. I feel very strongly about this. I have learned in business that breaking and renegotiating contracts is done only in emergency circumstances.

Regards,  
Derek  
+1 919 360 3963

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**From:** [Kathleen Alexander](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** LCP Vacation Rental Program Policy Option Meeting 7/26  
**Date:** Tuesday, July 20, 2021 5:31:18 PM

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COMMENT 40

## EXTERNAL

Dear Planning Department,

My husband and I own a home at the Sea Ranch. We just built the home, and received our final on July 1, 2020. (You were actually our planner when we came in to get our permit in Santa Rosa!). We had been renting at the Sea Ranch for 30 years before that. We rent our house part time, and live in it part time.

We have a great rental management company, and haven't had any problems with our renters annoying the neighbors. We're happy to have visitors enjoy the beautiful Sonoma coast, and our home. There are several other vacation rental houses on our street. (Which one of us homeowners would get to keep renting our home if this policy goes into effect and the Sea Ranch Association has the power to limit rentals to one every 300 feet?) We have never had any problems with the vacation renters on our street when we're here; in fact they are very respectful. The homes on either side of ours are both vacation rentals.

We enjoy seeing people walking by on the trails, and have noticed many more young families coming to the Sea Ranch, a welcome change! Covid brought many more people to this community, both owners and later, vacation renters, and I think part of the reason this proposal has been made is due to the obvious change in the number of people here. Everyone vacationing here is here to enjoy the coastal environment, as our family did before we had our own home, and it seems mean spirited to limit this access and try to keep it for just a certain group of people.

We weren't informed by the Sea Ranch Association Board that they were submitting a request to change the rules for vacation rentals, so it has come as a surprise, and frankly it's upsetting. The proposed restrictions seem like overkill meant to appease a small group of unhappy people. The property owners of the Sea Ranch were not informed about this proposal coming before the county in any of the many avenues they have to communicate with us.

We do have a Transient Occupancy Tax Permit, our management company has a business licence, and they collect and pay taxes for both Sonoma County and the Sea Ranch. We have garbage and recycling service through Recology year round. We limit the number of vacationers at our two bedroom house to four. We also have off street parking. All of these things are mentioned in the proposal as justification for limiting vacation rentals. Our vacation rental also employs Sonoma County residents for housekeeping, window cleaning, propane delivery, gardening service and general maintenance. Our vacation renters support the local economy when they come and patronize the grocery stores, restaurants, and gift shops.

Regarding the impact on the coastal environment mentioned in the proposal, from our observations, everyone stays on the well designated trails, which were meant to be used by all 2200(+) lot owners of the Sea Ranch, and their guests.

Please do not pass this proposal in any form. You would be giving a small group of people a

COMMENT 40

lot of power. What's next, will they limit the designated public parking lots and public access trails?

Sincerely, Kathleen and Tom Alexander  
182 Sounding  
The Sea Ranch, CA 95497  
808-283-1166, 650-534-5006  
182 [Sounding@gmail.com](mailto:182_Sounding@gmail.com)

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# BODEGA BAY FIRE PROTECTION DISTRICT

P.O. Box 6  
510 Highway One  
Bodega Bay CA 94923

Committed  
to  
Safety and Service

June 1, 2021

Via First Class mail and Email [PRMD-LCP-Update@sonoma-county.org](mailto:PRMD-LCP-Update@sonoma-county.org)

Permit Sonoma  
Cecily Condon, Lead Planner  
Gary Helfrich, Project Planner  
PRMD-LCP-Update  
2550 Ventura Avenue  
Santa Rosa, CA 95403

Re: Bodega Bay Fire Protection District comments and concerns  
about pending Sonoma County Local Coastal Plan Update

Dear Ms. Condon and Mr. Helfrich:

I am writing to you as the President of the Board of Directors of Bodega Bay Fire Protection District ("District") to share the District's comments and concerns about the pending Sonoma County Local Coastal Plan Update ("LCP"). As you may know, in March of this year, the District proclaimed a Fiscal Emergency due to insufficient funding and staffing, and this letter is intended to highlight the numerous threats that consequently have arisen to the safety of persons, property and the environment in the Coastal Zone covered by the LCP. As presently drafted, the working LCP Public Review Draft neither includes nor addresses the public safety risks that have arisen because of a change of the status quo. The District requests the LCP update include the significant limitations in fire and emergency medical services for the high tourism areas in the nearly 40% of the Sonoma County coast served by the District.

The public safety risks of reduced fire and emergency medical services are greater than the obvious areas wildland fire, ambulance response and general fire prevention and suppression. The District's reduced capabilities have an impact across the entire spectrum of the LCP, including, but not limited to, land use and property development; public access and recreation; transportation; public facilities and services; and protection of resource areas. Until such time as the District Fiscal Emergency is resolved, the public safety response capacity assumptions upon which these LCP elements and related appendices are based must be re-evaluated and updated to reflect the unfortunate reality that the District will be doing less with less.

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<b>Administration:</b>	<b>(707) 875-3700</b>	<b>Fax:</b>	<b>(707) 875-2660</b>
<b>Operations:</b>	<b>(707) 875-3001</b>	<b>Fax:</b>	<b>(707) 875-2285</b>

I understand that the Sonoma Coast Municipal Advisory Council and homeowner's association representatives in Bodega Bay are in communication with you regarding their concerns about public safety risks related to LCP issues. This direct communication from the District is intended to highlight the urgency of this situation and offer our assistance and expertise in assess and quantify the implications and impact of reduced District services on activities under the jurisdiction of the LCP and Coastal Commission.

At an LCP stakeholder meeting held at the District in December 2019 to get community input on the potential changes to the plan, the District Assistant Chief made clear to your team of presenters that the District, which provides the safety net for a major portion of the land within the LCP, was underfunded and understaffed. The District requested at that time that the LCP include a robust analysis of the safety needs in the area, as well as a plan for funding these public safety services. At that time, the District had 4 staff on each shift – now staffing is reduced to only 3 personnel. Although things have gotten worse, the LCP does not address this and does not propose the changes necessary to ensure that those who live in or visit the area covered by the LCP are kept safe, primarily by ensuring the public safety agency that protects them remains financially and operationally stable and sustainable. Accordingly, the District believes that the LCP has failed to adequately address the impacts and implications of this significant and ongoing public safety issue and asks that the LCP be revised with an analysis of the safety needs in the area and plan for funding these public safety services.

Thank you for your attention to these issues. Please contact me if you have any questions or would like additional information from the District leadership. We would also welcome a discussion with you at one of our regular Board meetings, which are held at 6:00 p.m. on the second Tuesday of each month at the District fire station. I look forward to working collaboratively with you and the LCP team.

Sincerely,



Liz Martin  
BBFPD Board President

Cc: Supervisor Lynda Hopkins [Lynda.Hopkins@sonoma-county.org](mailto:Lynda.Hopkins@sonoma-county.org)  
Sonoma Coast MAC Chair Scott Farmer [farmer.cmac@mcn.org](mailto:farmer.cmac@mcn.org)  
PRMD Director Tennis Wick [Tennis.Wick@sonoma-county.org](mailto:Tennis.Wick@sonoma-county.org)

**Revised-** Bodega Bay Public Utility District

The Bodega Bay Public Utility District (Bodega Bay District) provides water service to the residential, commercial, and industrial development in Bodega Bay, including the Bodega Harbour Subdivision, U.C. Davis Bodega Marine Laboratory, U.S. Coast Guard, County Doran Park, County Westside Park, and State Dunes Campground. Its water service area is slightly greater than its sewer service area. Most of the vacant lots in the Bodega Bay District are in the Bodega Harbour and Harbor View subdivisions. The sources of water for the District are the Sand Dunes wellfield (north of Bay Flat Road on the north end of the harbor) and Roppolo wellfield (west of Bay Flat Road on the west side of the harbor), Bay Flat well (constructed in 2018), and two wells next to Salmon Creek (not in use since 2013) north of Bodega Bay. Saltwater intrusion has limited the Roppolo wellfield to less than full capacity. The State Department of Water Resources prohibits use of the wells next to Salmon Creek when water depth in the creek drops below ten inches.

The most recent Municipal Service Review of the Bodega Bay District by the Local Area Formation Commission (LAFCO) was in 2004 and identified 1,797 existing Residential Unit Equivalent (RUEs). Most of this capacity went to the Harbor View development of 84 units, including 14 affordable units, developed by Burbank Housing Development, Inc. The Bodega Bay District's 2007 Master Water Plan proposed with two new wells and the total capacity of the current water storage facilities is sufficient for build-out. The proposed two new wells were constructed, one at the Roppolo wellfield in 2008 and the Bay Flat well in 2018.

**Original-**Bodega Bay Public Utility District

The Bodega Bay Public Utility District (Bodega Bay District) provides water service to the residential, commercial, and industrial development in Bodega Bay, including the Bodega Harbour Subdivision, U.C. Davis Bodega Marine Laboratory, U.S. Coast Guard, County Doran Park, County Westside Park, and State Dunes Campground. Its water service area is slightly greater than its sewer service area. Most of the vacant lots in the Bodega Bay District are in the Bodega Harbour and Harbor View subdivisions. The sources of water for the District are the Sand Dunes wellfield (north of Bay Flat Road on the north end of the harbor) and Roppolo wellfield (west of Bay Flat Road on the west side of the harbor), and two wells next to Salmon Creek north of Bodega Bay. Saltwater intrusion has limited the Roppolo wellfield to less than full capacity. The State Department of Water Resources prohibits use of the wells next to Salmon Creek when water depth in the creek drops below ten inches.

The most recent Municipal Service Review of the Bodega Bay District by the Local Area Formation Commission (LAFCO) was in 2004 and identified 1,797 existing Residential Unit Equivalent (RUEs). Most of this capacity went to the Harbor View development of 84 units, including 14 affordable units, developed by Burbank Housing Development, Inc. The Bodega Bay District's 1998 Master Water Plan identifies the need for a new well and additional water storage to serve the future demand from the previous Bodega Bay Phase I Land Use Plan. The Bodega Bay District constructed a 500,000-gallon water storage tank on District property in July 2003. Permits were issued in 2016 for a new well and water treatment plant off Bay Flat Road, but as of March 2017 they were not in operation.

## COMMENT 43

**From:** [Megan Kaun](#)  
**To:** [PRMD-LCP-Update](#); [greg99pole@gmail.com](#); [larry@reedgilliland.com](#); [Todd.Tamura@gmail.com](#); [arielkelley707@gmail.com](#); [cameron@mauritsonfarms.com](#); [Arielle Wright](#); [PlanningAgency](#); [Greg Carr](#); [Caitlin Cornwall](#); [Larry Reed](#); [Todd Tamura](#); [Gina Belforte](#); [Jacquelynn Ocana](#); [Kevin Deas](#); [Cameron Mauritson](#); [Eric Koenigshofer](#); [Belén Grady](#); [Lynda Hopkins](#); [district3](#)  
**Cc:** [Cea Higgins](#); [Richard Charter](#); [Rue](#); [Sarah Keiser](#); [Poison Free Malibu](#); [Padi Selwyn](#)  
**Subject:** Local Coastal Plan - Comment Submittal  
**Date:** Friday, October 01, 2021 5:29:19 PM  
**Attachments:** [Chalfant Ruling red.pdf](#)  
[California Attorney General Brief to Mountainlands Petition.pdf](#)

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### EXTERNAL

Dear Chair Tamura and members of the Planning Commission and Permit Sonoma,

Please see my comments below on the draft Local Coastal Plan. I thank you for your consideration, please do not hesitate to reach out to discuss further.

I also want to note that my comments, dated January 31 2020 were not included in the public comment records posted online (Public-Comments-2020-2021.pdf). The original email with these comments is also included in this correspondence. Please make sure they are added to the public record.

Best regards,  
Megan Kaun  
Sonoma Safe Ag Safe Schools  
[www.SonomaSASS.org](http://www.SonomaSASS.org)

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### **Comments on Policy Option: Pesticide Regulation**

A public meeting was to be held to openly discuss further pesticide use regulations in public and private land in the coastal zone. This meeting was canceled and replaced with the publication of this policy paper. Unfortunately, this paper does not include the most up to date case law and California Attorney General Rulings and therefore makes incorrect conclusions. Santa Monica Mountains and Malibu Local Coastal Plans currently regulate pesticide use on public and private lands over and above what is required by the California Department Pesticide Regulation (CDPR). These LCPs have been held up in State Court and through rulings by the California Attorney General. Please see below for specific comments.

**I am not necessarily advocating for a particular outcome for our Sonoma County LCP. I understand that locally we have a lot of factors to weigh that may be different from other areas in California. I do believe, however, that it is only right that we have an honest discussion about this option rather than declaring outright (falsely) that it is not an option for Sonoma County.**

1. The "Charles A. Pratt Construction Company v. California Coastal Commission, 162 Cal. App. 4th 1068, 1075 (2008)" ruled that LCPs are state laws, not local laws. This is why a County cannot be sued for the language of an LCP. This is also why "preemption", which stops pesticide regulations by cities and counties, does not apply to LCPs.

shall be prohibited, except where necessary to address invasive plant species. The eradication of invasive plant species shall consider first the use of non-chemical methods for prevention and management such as physical, mechanical, cultural, and biological controls. Herbicide application shall be restricted to the least toxic product and method, and to the maximum extent feasible, shall be biodegradable, derived from natural sources, and used for a limited time in order to minimize adverse impacts to wildlife and the potential for introduction of herbicide into the aquatic environment or onto adjacent non-targeted vegetation. Application of herbicides shall not take place during the winter season or when rain is predicted within one (1) week of application. In no instance shall herbicide application occur if wind speeds onsite are greater than five miles per hour.

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The preemption law (FAC §11501.1) is at <https://codes.findlaw.com/ca/food-and-agricultural-code-formerly-agricultural-code/fac-sect-11501-1.html>

It includes this sentence exempting state agencies:

"(c) Neither this division nor Division 7 (commencing with [Section 12501](#) ) is a limitation on the authority of a state agency or department to enforce or administer any law that the agency or department is authorized or required to enforce or administer."

This is why the Coastal Commission can regulate pesticides with LCPs.

2. Mountainlands Conservancy (an agricultural developer) sued the Coastal Commission (not Los Angeles County) over agriculture restrictions in the LA County Santa Monica Mountains LCP. One of their objections was that the LCP regulated pesticides and thus violated the preemption law.

The California State Attorney General weighed in and said pesticides can definitely be regulated in an LCP as an LCP is a state document.

See pdf page 18 section "**C. The Commission's Action Restricting the Use of Pesticides Is Consistent With Its Powers to Regulate Land Use Activities for Compliance with the Coastal Act**" in *California Attorney General Brief to Mountainlands Petition.pdf* attached.

Superior Court Judge Chalfant agreed with the Attorney General. See page 20 in *Chalfant Ruling red.pdf* attached.

Mountainlands Conservancy LOST, the Coastal Commission WON. Pesticides are currently being regulated by the Santa Monica Mountains LCP as well as the Malibu LCP on public and private land. The Ventura LCP is close to including specific pesticide regulations as well.

3. It is a common misconception that the California Dept. of Pesticide Regulation is in charge of ALL pesticide regulations. There are 14 states that do give exclusive power to regulate pesticides to one state agency. California is NOT one of the 14.

4. Pesticide use can be considered "new development". Guidance from the California Coastal Commission is that this distinction can be determined by each county so Sonoma County has a choice.

**5. Sonoma County is already managing publicly owned land in the coastal zone in a very progressive way!** On June 4 2019 Sonoma County Supervisors voted on a new policy on pesticide use that prohibited synthetic pesticide use on all agency maintained campuses, sidewalks, playing fields, plazas, playgrounds, and county-maintained libraries. In addition, all county departments submitted no-spray-zone maps that included where they would never use synthetic pesticides. This existing county regulation is actively in effect in our coastal zone and the details of it, including the existing for Integrated Pest Management before pesticides are ever used should be noted in this document.

6. The "right to farm" ordinance which protects farmers from adjacent resident's complaints against things like noise, manure smells, dust, lights, etc. does not provide farmers with the right to violate state pesticide use regulations per the CDPR. Pesticide drift, which often comes in the form of smells or "dust" or in water runoff remains prohibited by law.

On Fri, Jan 31, 2020 at 9:18 AM Megan Kaun <[megan.kaun@gmail.com](mailto:megan.kaun@gmail.com)> wrote:

Dear Cecily and members of the Planning Commission,

I want to thank you for openly listening to me and other members of the public yesterday at the Local Coastal Plan hearing. I have included some additional information on the suggestion I made to incorporate a ban on synthetic pesticides (herbicides, insecticides, fungicides, and lethal rodenticides) as part of this updated document.

Last month, the [City of Malibu included a ban on pesticides](#) in their LCP with an exception for herbicide use for invasive species control (wording from Santa Monica's approved LCP attached). Los Angeles County had earlier provided precedent to do this in their LCP for Santa Monica Mountains ([SMM LCP Land Use Plan](#) and [SMM LCP Local Implementation Program](#)).

In June of last year, the County made a commitment to stop using synthetic pesticides (again, with some exceptions for invasive species management). Our LCP has the authority to incorporate this type of policy throughout the entire Coastal Zone.

I have included below some suggested policy language based on the Malibu and LA Local Coastal Plans. Please feel free to contact me directly if you would like to discuss this further.

Best regards,  
Megan Kaun  
Board Member, Sonoma County Conservation Action  
773-677-1639 (cell)

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Suggested language for pesticide ban in Sonoma County LCP

One of the main objectives of the Coastal Act is the preservation, protection, and enhancement of coastal resources, including land and marine habitats, and water quality. Chapter 3 of the Coastal Act states that environmentally sensitive habitat areas shall be protected against disruption of habitat values and that development should be designed to prevent impacts and be compatible with the continuance of those habitats. The use of synthetic pesticides, including insecticides, herbicides, fungicides, and lethal rodenticides, can have a negative effect on habitat values by directly impacting the health native species and habitats. Preserving and enhancing native species and habitats will help ensure Environmentally Sensitive Habitat Areas are protected and enhanced.

The use of synthetic pesticides, including insecticides, herbicides, fungicides, and lethal rodenticides or any toxic chemical substance that has the potential to significantly degrade biological resources in the Sonoma County Coastal Zone

Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Introduction</b>						
1. Authority and Purpose	1.1 Authority for & Administration of LCP	1	1	1.1.1: 2nd para:	...policies related to coastal development.... adopted....in General Plan 2020 inappropriately assumes development and imposes General Plan formatting. In addition, there is no side-by-side strikethrough comparison view of the current LCP with this draft.	"...Coastal Commission, and to revise the Local Coastal Plan to a more modern format while maintaining the original intent to conserve this priceless and fragile natural resource which provides a powerful buffer against climate change. New science is included in the Elements and Policies with regard to sea level rise, carbon sequestration in soil and forest, conservation of biotic resources, clean energy generation, water quality and re-charge, aquaculture, and geologic hazards. The issues of open space, viewscape and small coastal community preservation, public safety, transportation and access, appropriate housing, short-term rentals and a sustainable form of tourism are addressed. In addition, a strike-through comparison of this draft is provided." (provide a link here)
cv			P1	1.1.1, 2nd para	Projections of growth and development in the coastal zone as presumed by previous rates of growth is no longer viable. The California Coastal Act was written 44 years ago, before climate change was generally recognized and before Bay Area population and wealth burgeoned, creating unimaginable resource and tourism pressures on the Sonoma Coast. In general, the concept of carrying capacity should apply to any new policy applied to the coastal zone, where water, open space, viewscape, affordable housing, emergency response, roads and other infrastructure are in short supply compared to demand. The Draft LCP does not reflect the reality of our times nor the necessary restraints required to conserve our coastline over the next 20 years.	Delete the last 2 sentences of the 2nd paragraph.
			4	1.1.2	The Administrative Manual should be maintained as a separate document.	
			4	1.1.2 (4)	The wording of this item is not specific enough.	Development on the Coast should be limited to proven necessary improvements in fishing industry and service worker support within existing commercial zones.
			6	1.1.3 (2)	"Where policies within the Local Coastal Plan overlap or conflict, the policy which is the most protective of coastal resources shall take precedence."	When policies within the Local Coastal Plan overlap or conflict, policies of the Coastal Act must take precedence over those of the LCP.
			6	1.1.3 (3)	"Prior to the issuance of any development permit required by the Local Coastal Plan, the County shall make the finding that the development meets the standards set forth in all applicable Local Coastal Plan policies and Coastal Zoning Ordinance regulations."	The County shall make the finding that the development meets all standards set forth in the LCP, consistent Coastal Zoning Ordinance regulations and the Coastal Act.
			7	1.1.4 Appeals	"Certain types of development, as well as development within certain geographic areas that are acted on by the County after certification of the LCP, are appealable to the Coastal Commission (Public Resources Code Section 30603). These include: (1) Developments approved by the local government between the sea and the first public road paralleling the sea or within 300 feet of the inland extent of any beach or of the mean high tide line of the sea where there is no beach, whichever is the greatest distance. (2) Developments approved by the local government not included in the above, located on tidelands; submerged lands; public trust lands; within 100 feet of any wetland, estuary, stream; or within 300 feet of the top of the seaward face of any coastal bluff. (3) Development approved by the local government not included above that are located in a sensitive coastal resource area. (4) Any development approved by the local government that is not designated as the principal permitted use in the Coastal Zoning Ordinance. (5) Any development which constitutes a major public works project or a major energy facility (whether approved or denied by the local government)."	This section is ludicrous. There is no p



			6	1.1.4 (4)	Prefacing discussion in text is intended as justification for the enumerated Local Coastal Plan policies and map designations. Therefore, the text shall be considered as the findings justifying the specified policies and Land Use and Open Space Map designations. Coastal lands are impacted in some way by development...the coast, the bay and everything else within the coastal zone. The area is located within the Alquist Priolo Zone, directly on top of the San Andreas Fault, is one of the most sensitive areas along the entire California coast."	The maps in this new Draft LCP are <b>at least</b> 20-25 years old—inaccurate and incomplete. They must be updated in GIS format, now easily available. They are not fit for the LCP.
	1.2 History of the LCP	7	7	1.1.4 (4)	The language used here refers to two as-yet-undefined terms—"principal permitted use" and "Coastal Zoning Ordinance", making the sentence uninterpretable for the ordinary citizen. As it now stands, the Draft LCP does not contain logically or easily locate-able definitions of either term.	Save the issue of appeals until the end of the document or after these terms are defined in the body of the document.
2. Regional & Local Context	2.1 Regional & Sonoma County Coast Setting	8	9	2.1, para 6	the 3rd sentence of this paragraph is mis-punctuated and unintelligible. The words Permit Sonoma GIS Profile are not defined and appear to be an internal notation not meant for the public version of the draft.	Unable to suggest an appropriate change as the wording is not clear enough to work with.
		9	10	2.1, para 6, 3rd sentence continued	It is stated that residences originally planned as second homes "are now increasingly occupied by permanent residents" or "home-based businesses". This is incorrect, as it is now clear that a large percentage of residences in the coastal zone are now vacation rentals.	Recommend deleting these two sentences.
	2.2 History of Sonoma County Coastal Protection by Citizens	10				
	2.2.4 Coastwalk California	12	12	2.2.3 Last Sentence of 2nd paragraph	Please fix typos and missing content: The Coastwalk California 2013 website states" Today, with the help of dedicated volunteers, Coastwalk continues its legacy of thousand of people to the natural and human history of the spectacular California coastal landscape and helping to promote its conservation."	The Coastwalk California website states "Today, with the help of dedicated volunteers, Coastwalk continues its legacy of promoting coastal conservation by introducing people to the natural and human history of the spectacular California coastal landscape."
	2.3 Intergovernmental Planning Coordination	13	14	2.3, para 2	If there is to be a listing of other Coastal governing bodies and agencies to be consulted, it is important to name them all, including those most conspicuously absent, such as the Bodega Marine Lab, NOAA, Tribes, National Marine Sanctuary and State and Regional Parks.	Recommend a full listing of all other governing bodies and agencies involved in determining the fate of the Coastal Zone. This may be footnoted if too long to include in the text.
	2.4 Adaptation to Change	15				
3. Organization & Overview	3.1 Local Coastal Plan Format	16		2.4, para 2	A series of philosophical quotes on the need for change and adaptation are interestingly included here, in an otherwise very cut-and-dried document. As long as there is room for editorializing, there should be included a clear message re: the importance of conservation and enhancement of natural resources despite the pressure of population expansion and exploitative economic temptations.	Recommend dropping the content after the first sentence and instead writing: "Given the long history of dedicated coastal activism and the local presence of the best coastal science research, there is no doubt that the informed citizenry of Sonoma County will work together to optimize conservation of this priceless resource."
	3.2 Local Coastal Plan Elements	18	19	3.2.1, para 1, 1st and 2nd sentence	A policy is a specific statement in text or a diagram guiding and implying clean commitment to an action. It is a MANDATORY declaration of an obligation intended specifically to govern the approvability of permit applications	This definition of policy does not match the definition of policy in the Glossary which defines Policy as "Specific statement that GUIDES decision making in order to achieve a goal or objective." A policy is a mandatory declaration;therefore the definition in the Glossary should match that in the Introduction.
	3.2 Local Coastal Plan Elements	18	19	3.2.1, para 1	In the last sentence, there is reference to numbered recommendations in the prior LCP which are not being included in the new LCP. They should be included and enumerated for the purpose of allowing the public to see how the new LCP compares with the old one. [1]	Include as a footnote or as an appendix an easily- referenced, enumerated listing of the recommendations that have been dropped from the current draft.
	3.2 Local Coastal Plan Elements	18	19	3.2.1, para 5	GP 2020 Revised; Existing LCP Revised defined as either the policy in General Plan 2020 or in the Existing Local Coastal Plan has been revised	There is no reference to the existing language in the policy that was revised; therefore no way of knowing what was changed or what language was in its current form therefore no comparisons can be made.

	3.2 OSRC Element - Biotic Resource Protections	21	21	Policy C-OSRC 5	<p>New overall policy to protect all Biotic and Human Resources which would prohibit the use of any synthetic pesticide, insecticides, herbicide, fungicide and rodenticides or any toxic chemical substance which has the potential to significantly degrade biological resources shall be prohibited throughout the entire Sonoma Coastal Zone. The eradication of invasive plant species or habitat restoration shall consider first the use of non-chemical methods for prevention and management such as physical, mechanical, cultural, and biological controls.</p> <p>Herbicides may be selected only after all other non-chemical methods have been exhausted. Herbicides shall be restricted to the least toxic product and method, and to the maximum extent feasible, shall be biodegradable, derived from natural sources, and use for a limited time. Coastal Commission staff supports the addition of LCP policies and provisions prohibiting the use of anticoagulant types of rodenticides in order to protect ESHA and wildlife.</p> <p>As you are aware, anticoagulant rodenticides can cause grave injury and death to wildlife that ingest rodents that have consumed such rodenticides. In order to avoid these impacts, the Coastal Commission has consistently prohibited the use of anticoagulant rodenticides as a condition of coastal development permits, notwithstanding that pesticides are already regulated by the Department of Pesticide Regulation). Although LCPs and LCP amendments are adopted by local jurisdictions, they must be approved by the Coastal Commission, which is required to find that they conform to the Coastal Act. Accordingly, because LCPs and LCP amendments embody state law and must be certified by the Coastal Commission, we agree that local jurisdictions may adopt LCPs and LCP amendments that addresses</p>	<p>New overall policy to protect all Biotic and Human Resources which would prohibit the use of any synthetic pesticide, insecticides, herbicide, fungicide and rodenticides or any toxic chemical substance which has the potential to significantly degrade biological resources shall be prohibited throughout the entire Sonoma Coastal Zone. The eradication of invasive plant species or habitat restoration shall consider first the use of non-chemical methods for prevention and management such as physical, mechanical, cultural, and biological controls. Herbicides may be selected only after all other non-chemical methods have been exhausted. Herbicides shall be restricted to the least toxic product and method, and to the maximum extent feasible, shall be biodegradable, derived from natural sources, and use for a limited time.</p>
	3.2 OSRC Element	20	20	3.2.4, para 2, under Scenic Resources	last sentence "...and to minimize other visual impacts of development." The wording of this sentence presumes development in the Coastal Zone.	add to the end of the sentence: "... development, which will be limited to existing areas of infrastructure or commercial zoning."
		20	21	as above	last sentence of the section says "general urban design guidelines for other urban development on the Coast". The concept of urban development at all on the Coast is anathema.	End this sentence after "...enhance their unique character."
		20	21	as above, under Biotic and other Natural Resources	Refers to maps of ESHAS, which on review are of inadequate detail and quality. States "... only the "Preservation" sensitivity designation is retained." Why is that? There should be a formal explanation and an explanation of how the other designations are addressed. Saying that the protection of ESHAs is addressed under policies in the OSRC Element is insufficient, especially as those policies are unclear and ill-defined. This is an example of loss of continuity between the previous LCP and this one and the impossibility of tracking critical changes meaningfully.	
	3.2.4 Public Access Element	20	22	3.2.4, Public Access, para 4	inaccurate punctuation throughout	rewrite with accurate punctuation
	3.2.8 Public Safety Element	23	23	last sentence of section	punctuation error	remove semicolon after "State Route 1"
	3.2.10 Noise Element	24	24	last sentence of section	punctuation error	remove semicolon after "special events"
4. Citizen Participation in Plan Preparation		24	24	Para 1 and workshop listing	The CAC appointed by the BOS to comment on the General Plan was not intended to give direction to the LCP, nor was it educationally qualified to give comment on the LCP. To list of 2015 public workshops on the LCP after the first paragraph is misleading as well as inaccurate. It does not include the most important workshop of all, held at Timber Cove (not at the PRMD Hearing Room) by public demand on July 14th, as there was insufficient publicity about the prior workshops to ensure adequate public participation. At the Timber Cove workshop, public opinion was resoundingly rejecting of the LCP draft. As a result, the draft has not been revisited until now, 5 years later.	Limit this paragraph to the first sentence only, without implying that there has been to-date, any meaningful public participation, as there has not.
5. Acknowledgements (LCPU & GP 2020)	5.1 Board of Supervisors	25				

	5.2 Planning Commissioners	25			
List of Tables	C-INT-1 Priority of Coastal Land Use	5			C-INT-1 Would like original source cited, as this table seems to reflect different priorities than those of the CCC stated on 4.

[1] Hi

Element	Section	Page	Comment Page	Comment Section	COMMENT	Change To
<b>Land Use</b>						
1. Introduction	1.1 Purpose	1	1	1.1, para 3	Applying General Plan language and policy to the coastal zone is inappropriate. Per Richard Charter's letter to Cecily Condon on 2/16/20: "6) The LCP is Not Interchangeable with the Countywide General Plan: In the context of the LCP Update, General Plan 2020 is not arbitrarily transposable to the Sonoma Coast. Transmigration of some of the more concerning aspects of the Countywide General Plan into the LCP should not take place now, nor should it be enabled in the undefined future. Our coast is a unique and irreplaceable asset and deserves the kind of profound respect and due care that it was accorded during the thorough public process by which the first Sonoma County LCP was initially formulated and adopted."	

					<p>Per Richard Charter's letter of 2/16/2020 to Cecily Condon, page 7: "5) The Dangers of Providing Too Much Staff Discretion in Administering the LCP: There should be no discretionary "loopholes" carved out of the LCP for special interests, as is the case with the current public draft. One clear crosscutting problem that must be highlighted is that for almost every single land use provision throughout the LCP Update public review draft, there is inexplicably granted to Permit Sonoma planning staff a very wide margin of discretion in terms of interpretation and implementation. This undue level of staff discretion invades virtually all facets of the LCP, from allowances for exceeding building height limits between Coast Highway One and the ocean to protect important viewsheds, to arbitrarily enabling circumvention of requirements for adequate public health buffers for expanded or new septic system setbacks from existing domestic wells in older subdivisions, to potential overexpansion of commercial enterprises and even new expansion of some of our existing small towns, if additional water supply and/or wastewater treatment capacity were to be added. The consistent administrative treatment of all Coastal Permit applicants, without the present practice of granting of biased access gained through retaining expensive consultants who are sometimes former County staff, must particularly apply to inappropriate proposals for rural commercial event centers in agricultural settings and to all other threats to conservation lands, safe communities, and open space protection. 6) The LCP is Not Interchangeable with the Countywide General Plan: In the context of the LCP Update, General Plan 2020 is not arbitrarily transposable to the Sonoma Coast. Transmigration of some of the more concerning aspects of the Countywide General Plan into the LCP should not take place now, nor should it be enabled in the undefined future. Our coast is a unique and irreplaceable asset and deserves the kind of profound respect and due care that it was accorded during the thorough public process by which the first Sonoma County LCP was initially formulated and adopted."</p>	
	1.2 California Coastal Act	2	2	1.2, para 1	States that citations exist in other Elements but provides no linkage or ability to cross-reference them, which means that we must take the author's word that "all of the policies were evaluated in preparing this Land Use Element"	Provide references to the other Elements for each policy.
	1.3 Sonoma County Coastal Setting	2				
		3		Table C-LU-1	Population figure for Duncans Mills is 20 years old and those for other communities are 10 years old. These figures are now inaccurate, outdated and do not fit data upon which to base following policies.	

		3			For permanent, voting, engaged residents of the coastal zone, the vacation rental "industry" is not so much "an integral part of the tourist industry on the coast" as a disorganized, unregulated invasion of strangers into otherwise potentially affordable housing. At their worst, uninformed tourists can abuse and trash coastal resources, create a public nuisance or even harm local residents. They use services and resources that are already in short supply. The regulation of vacation rental housing is long overdue and has created a backlash of ill will between negligent property owners, their "guests" and local coastal residents.	
			3	1.3 Last Para	According to the author, the Sonoma County General Plan projects 3283 new residents by 2020, a near-tripling of the current coastal population to 11,700. How was that number calculated and where will those new residents live?	
	1.4 Relationship to other Elements	3				
		3		1.4 (3)	Whose judgement or what method resulted in the "balance among the various goals.....in all the Elements."? This presentation is impenetrable by the average citizen and represents a lack of public participation.	Provide transparent methodology, background and explanation of how "balance" was achieved. Define "balance" as intended in LCP.
		4		1.4 (4)	When is it <b>unnecessary</b> to cross-reference?	
	1.5 Scope & Organization	4		1st para	First paragraph states that Land Use Maps are displayed at the end of the Land Use Element. They are not. Maps are displayed under "figures" at the end of the entire draft. Also, it would be helpful to explain the status of land use designations. Are they long-standing? Current? Previously determined? If so, by what zoning or policy?	
	1.5	4		2nd para	Last sentence is unclear...."and on an evaluation....."?	
					Land use categories described in this Element require both a Land Use Map amendment and a Local Coastal Plan Amendment. Nowhere in the Land Use Element is there a link to the previous LCP so that citizens wishing to meaningfully comment could compare proposed maps and language with existing maps and language. Additionally, the zoning significance of the proposed amendments is not made clear to a concerned public and there are no Draft Zoning Ordinances presented	
	1.5	4		4th para	The LCP Amendment process should be described - or referenced. Eg, will the Director of Permit Sonoma personally evaluate every amendment application? Who, specifically, has the authority to approve amendments? Is there any transparency or public notification protocol of amendment applications? These questions are particularly germane in reference to the following lot line adjustment guidelines.	

		5		1.5 (2)	The "coastal development permit approval process" is not linked or referenced. No examples are given to allow the public to understand this process.	
		5		1.5 (3)	What are "no new adverse impacts"? Climate Change has aggravated the situation since the 1981 LCP was written.	"No adverse impacts on views, biotic or other environmental resources" may result. Include the following language from the 1981 LCP: "The Public Service Section evaluates water, waste disposal, emergency and education services. Generally, the coast is a water-scarce area, and land conditions are poor for septic systems. This lack of basic services necessarily limits any further infrastructure supportive of future development."
		7			The lack of basic services necessarily limits any further infrastructure supportive of future development.	include the following language from the 1981 LCP: "The Public Service Section evaluates water, waste disposal, emergency and education services. Generally, the coast is a water-scarce area, and land conditions are poor for septic systems."
2. Land Use Description	2.1 Priority of Land Uses	5			Please break this paragraph down into shorter sentences, use examples and precede with coherent definitions.	
	2.2 Land Use Categories	5			The first sentence describing the definitions in this category is confusing in itself. Please clarify (eg, do you mean to say PUs and Other PUs?).	
		6		Land Use Table C-LU-2 Notes (1)		... recreational uses of the coast <b>must not require substantial alteration of the natural environment.</b>
		6		Table C-LU-2	Lowest priority is given to affordable housing in developed areas, which is inconsistent with the current draft and Sonoma County's stated goal of providing service worker and fishing community affordable housing. At the same time, it is clear that high-density affordable housing, even in areas with infrastructure, would destroy the unique character of the Sonoma Coast.	
	2.2.1, Land Use Definitions	7		Table C-LU-3 and following Land Use Definitions	The relationship between the Table and the following Definition is in itself confusing. Is it meant to say PUs and Other PUs in describing the two categories??	
		7			Under definition of Principally Permitted Use, there is contradictory information that allows the County to override the intent of the California Coastal Act by approving development exceptions in an area of Principally Permitted Use and then turning a deaf ear to legitimate appeals. There are examples of this pattern in the coastal zone already.	There shall be early (eg, prior to full application) MAC, general public and Coastal Commission notification and public vote on any developments proposed within areas of Principally Permitted Use.
		7			last sentence: vacation rentals are commercial uses outside commercial land use designations and have not been uniformly appealed to the Coastal Commission but should and will be (see section 3.2).	



		8	Appeal jurisdiction	Under the broad definition of "resource-dependent", aggregate mining could theoretically be approved in ESHA. The appeal jurisdiction area includes, but is not limited to: areas west of Highway 1, areas within 100 feet of a wetland, estuary or stream, and development located in a sensitive coastal resource area. Only resource-dependent uses may be permitted within an environmentally sensitive habitat area. All clearing of vegetation, grading, excavation, fill or construction are subject to the site development standards contained in the Open Space and Resource Conservation Element	Clearing of vegetation, grading, excavation, fill or construction shall be prohibited in ESHA, as stated in the OSRC Element.
		8	2nd para: Other Permitted Uses	5) As per Richard Charter's letter to Cecily Condon of 2/16/20, "...5) The Dangers of Providing Too Much Staff Discretion in Administering the LCP: There should be no discretionary "loopholes" carved out of the LCP for special interests, as is the case with the current public draft. One clear crosscutting problem that must be highlighted is that for almost every single land use provision throughout the LCP Update public review draft, there is inexplicably granted to Permit Sonoma planning staff a very wide margin of discretion in terms of interpretation and implementation. This undue level of staff discretion invades virtually all facets of the LCP, from allowances for exceeding building height limits between Coast Highway One and the ocean to protect important viewsheds, to arbitrarily enabling circumvention of requirements for adequate public health buffers for expanded or new septic system setbacks from existing domestic wells in older subdivisions, to potential overexpansion of commercial enterprises and even new expansion of some of our existing small towns, if additional water supply and/or wastewater treatment capacity were to be added. The consistent administrative treatment of all Coastal Permit applicants, without the present practice of granting of biased access gained through retaining expensive consultants who are sometimes former County staff, must particularly apply to inappropriate proposals for rural commercial event centers in agricultural settings and to all other threats to conservation lands, safe communities, and open space protection."	Please break this paragraph down into shorter sentences, use examples and precede with coherent definitions. In addition, remove language enabling opaque discretionary power by Permit Sonoma staff.

2.2.2, Agriculture Land Use	8		Line 4	<p>There should be no discretionary "loopholes" carved out of the LCP for special interests, as is the case with the current public draft. One clear crosscutting problem that must be highlighted is that for almost every single land use provision throughout the LCP Update public review draft, there is inexplicably granted to Permit Sonoma planning staff a very wide margin of discretion in terms of interpretation and implementation. This undue level of staff discretion invades virtually all facets of the LCP, from allowances for exceeding building height limits between Coast Highway One and the ocean to protect important viewsheds, to arbitrarily enabling circumvention of requirements for adequate public health buffers for expanded or new septic system setbacks from existing domestic wells in older subdivisions, to potential overexpansion of commercial enterprises and even new expansion of some of our existing small towns, if additional water supply and/or wastewater treatment capacity were to be added. The consistent administrative treatment of all Coastal Permit applicants, without the present practice of granting of biased access gained through retaining expensive consultants who are sometimes former County staff, must particularly apply to inappropriate proposals for rural commercial event centers in agricultural settings and to all other threats to conservation lands, safe communities, and open space protection.</p>	.. two agricultural use categories: Land Extensive Agriculture and Diverse Agriculture.
2.2.2, Land Extensive Agriculture Areas	8		1st line	"....category enhances and protects...."—the category by itself does nothing.	".....the category refers to.....".
	9	<i>Permitted Uses</i>	3rd para	The Coastal Zoning Code is referred to repeatedly as the ultimate determining factor in Permitted Use policy but there is no linking citation. Of major concern to the public is the specter of vineyards in the Coastal Zone, along with its attendant promotional activities.	
		Permitted residential densities		According to the text, land may be subdivided into 640-acre parcels and there may be as many as four different dwelling units, including multiple-person units, on every 160 acres within each parcel, preferably clustered. This makes sense for a working farm/ranch. It also leaves room for piecemeal approval of structures that could be later converted into Ag promotion (eg, winery), farm-stay tourism (without permit) or quietly rented vacation homes. There is no enforcement provision for this seemingly harmless policy.	Specifically exclude vineyards or cannabis conversions from the coastal zone without public permitting processes (not ministerial). Provide meaningful disincentivizing enforcement to prevent violations.
	9-10	Land Extensive Agricultural Designation Criteria		This section is confusingly worded. It mentions the necessity for a Local Coastal Plan Amendment in order to create a Land Use Map Amendment. It lists 5 criteria to qualify for an amendment. But it does not connect in any logical way to the paragraph preceding it. Why is a Land Use Map Amendment being suggested? Why is one of the criteria that surrounding parcels be of 60 acres or more?	Rewrite this section to make it understandable for the public and consistent with the content of the preceding paragraph.

		10	Diverse Agriculture Area	Permitted Uses	Again, there is no link to the Coastal Zoning Code. There is reference to agricultural industry and community serving facilities that may be permitted, both of which may be subject to piecemeal approval of unintended uses over time without enforcement language.	Specifically prohibit ministerial permitting of vineyards and cannabis cultivation from the coastal zone. Commercial promotion of agricultural crops through events and other high-impact activities in the fragile environs and infrastructurally insupportable setting of the coastal zone shall not be allowed.
		11	Permitted Residential Densities		Per Richard Charter's 2/16/2020 letter to Cecily Condon, page 9, regarding the need for updating of antiquated permitted uses and establishing County oversight of Timber Harvesting Practices instead of deferring to CalFire: "... The LCP Update section on Timber Land Use Areas needs to be reconfigured and improved to grant additional oversight over the location and methods of conduct of forest practices to the County of Sonoma, rather than perpetuating an over-reliance on antiquated Permitted Uses within Timberland Production (TP) or Resources and Rural Development (RRD) categories. The County of Sonoma needs to stop consenting to CalFire's free reign over review and approval of proposed Timber Harvest Plans (THP's), particularly in the Coastal Zone. The County should also be the final arbiter of vineyard conversions of forestland, as well as standing as the primary responsible steward in protecting our hypersensitive riverine floodplain habitats. The LCP reflects overarching stewardship values that should be at the core of any Sonoma County evaluation of pending THP's. To do otherwise simply ignores the underlying importance of how we collectively treat our timberlands as a key to maintaining the viewsheds and the often erosion-prone watersheds along our coast. Timber harvests in the Sonoma County Coastal Zone are not always compatible with the identified Special Treatment Areas adopted by the Coastal Commission on July 5, 1977. Special Treatment Areas are forest areas designated within the Coastal Zone that constitute a significant wildlife and/or plant habitat area, area of special scenic significance, or any land where timber operations could adversely affect public recreation areas or the biological productivity of any wetland, estuary, or stream deemed especially valuable because of its role in a coastal ecosystem." Best forestry practices dictated by changing climate (eg, fire fuel reduction) and new science on the role of old growth and thinning techniques which minimize erosion are referred to in the OSRC Element, p. 47.	
			Mining (not mentioned)		Specifically, mining in the area of Cheney Gulch should not be allowed. See page 9 of Richard Charter's 2/16/2020 letter to Cecily Condon for reasons.	
2.2.3 Recreation and Natural Resource Land Use		11		first para	"The intent of the policy is to ensure natural resource production and coastal dependent public recreation uses are...."	Change "natural resource production" to "natural resource protection".

		12, 13	Recreation Land Use Areas		No link to the Coastal Zoning Code, specifically for the categories mentioned (Planned Community Zone and Resources and Rural Development). Further development of Planned Communities in the Coastal Zone with tennis courts and golf courses is untenable for multiple reasons (eg, inadequate water supply, impacts on wildlife, viewscape, erosion, etc) and should be prohibited from the coastal zone entirely.	Further development of Planned Communities in the Coastal Zone with tennis courts and golf courses is untenable for multiple reasons (eg, inadequate water supply, impacts on wildlife, viewscape, erosion, etc) and should be prohibited from the coastal zone entirely.
		13	Recreation Permitted Residential Densities		With the description of 4 dwelling units of all types permissible per 160 acres on a minimum 640-acre parcel, it is easy to imagine a golf course with condos, clubhouse, restaurant facilities, etc, being permitted over time. This form of recreational land use and residential support for it should be expressly prohibited.	Prohibit golf courses, tennis clubs, condo construction, etc, in the coastal zone. Define by example what types of recreational activities and supporting dwellings would theoretically be permitted, along with strong enforcement language.
		13	Resources and Rural Land Use Development Areas		The resources described here (water, timber, geothermal steam and aggregate production) are apparently mis-applied and more consistent with General Plan resources inappropriate as applied for the coastal zone.	Rewrite this introductory paragraph to reflect which resources (eg, selectively harvested timber to mitigate fire risk while improving forest health) are appropriate to name or utilize in the coastal zone.
		14	Permitted Uses		Problems pertain to this section as cited in Permitted Uses beginning on page 9 and continuing to this point: a lack of linkage to Coastal Zoning criteria, insufficient applicability to the coastal zone, potential abuse of original intent by piecemeal uses and/or permit approvals, insupportability of resource extraction from the coastal zone, and lack of enforcement provisions.	Please re-evaluate and re-align language as suggested in preceding changes recommended.
			Resources and Rural Development Designation Criteria.		A Land Use Map Amendment to apply the Resources and Rural Development land use designation requires a Local Coastal Plan Amendment subject to certification by the California Coastal Commission and must meet the standards in Chapter 3 of the California Coastal Act. A Local Coastal Plan Amendment to apply the Resources and Rural Development land use designation must also be consistent with other policies of the Local Coastal Plan and meet one or more of the following criteria: 1) Land has severe constraints such as geologic, flood, or fire hazards; marginal or unproven water availability; or limited septic capability. (2) Land contains natural resources such as water, timber, geothermal steam, aggregate, or soil; 3) Land contains biotic or scenic resources. (4) Land is vulnerable to environmental impact.	Resource and Rural Development are activities contrary to the criteria. Change to: "Resource and Rural Land Use Development shall not take place on lands that meet one or more of the following criteria:..."
		15	Timberland Use Areas	Permitted uses, first para:		".. land management informed by new science on climate change and best forestry practices for the continued operation.....", etc.
		15		Permitted uses, first para, last two sentences:	(2) Land contains natural resources such as water, timber, geothermal steam, aggregate, or soil.	Define "accessory uses", "very low residential development" and "agricultural operations" specifically for meaningful public input to the Draft.

		16		Timber Designation Criteria, (1), (6) and (7)	Timber Site Classes I-VIII are not defined and therefore meaningful public comment cannot be made.	Define the Timber Site Classes. The highest use of "Timber Sites" or TPZ (Timber Production Zoning) is forest conservation management for carbon sequestration, then habitat, followed by active (not motorized) recreation. If climate change were really a priority at the County as they claim, these would top the list of County concerns.
		16, 17	Dedicated Open Space Areas		The language used in this section seems to be General Plan language inappropriate to the coastal zone. It provides for open space in new planned developments and planned communities in rural residential areas of Bodega Harbour and refers to a "Precise Development Plan" which is not referenced and the need for an amendment to the Local Coastal Program. There should be a moratorium on further development and planned communities in the coastal zone. The coastal zone is already at maximum carrying capacity.	Existing residential, commercial, agricultural, fishing, tourist-serving areas (ie, all but open space lands) should have a maximum growth perimeter and density ceiling.
	2.2.4 Commercial Land Use	17		2nd para, line 6	...."other industries associated with the marine environment" is a broadly permissible term for industrial development in the coastal zone, given the potential for large-scale aquaculture and offshore wind turbine potential industry, in addition to other high-impact marine-related industry not yet imagined. Considering commercial fishing as the premier and potentially only <i>supported</i> industry.	Specifically limit in nature and size any future industrial development in the coastal zone.
		17			Most of the Commercial Fishing facilities required on the coast would be accommodated in Bodega Bay.	Drop "Most of the". Reads: "Commercial Fishing facilities required on the coast would be accommodated in Bodega Bay".
		18		Last para, first sentence:	This section, which begins with language pertinent to commercial fishing, has here expanded to include "additional resource, recreational, and community serving uses and structures."	Remove this paragraph in its entirety.
		18		2nd para:	"Commercial land uses located by an ESHA.....require a use permit". Permitting of commercial land use "by an ESHA", etc is antithetical to the conservation of ESHA. Change to:	"Commercial land uses will not be permitted within 1200' of ESHAs" (see OSRC Element, Policy C-OSRC-5b(5) for an example of buffers suggested for any form of development near ESHAs. Commercial land uses, due to their inherently higher environmental impact, should be buffered by at least double the distance from an ESHA containing, for example, a heron rookery.
		19	Designation Criteria, (5)		The term "other industries which depend on the marine environment and resources" is again too broad to protect against large-scale industries like aquaculture and offshore wind turbines.	See change recommended directly above. (for Page 18)
		19	Building Intensity		The Building Intensity definition is unclear and does not logically translate in the italicized terms and stipulations below. In addition, it is not clear whether the stipulations are already existing or are a change from the previous LCP.	

	Commercial Tourist Areas	19	Last para		The stipulation that visitor-serving commercial uses would be "compatible" with "nearby" agricultural operations and uses is inappropriate, given the dearth of resources and infrastructure. The term "nearby" is not clearly defined.	To remove any possibility of this language resulting in further, inappropriate encroachment of wine or cannabis-related activity in the coastal zone, expressly prohibit the expansion of vineyards or cannabis grows, tasting or smoking rooms, supporting structures for these industries and any associated events in the coastal zone.
		19	Designation Criteria	(5) c)	refers to "support of other industries....." besides fishing, which could potentially translate to heavy industry such as wind turbines, etc.	Eliminate "c)"
		20	Permitted uses	1st para	The Coastal Zoning Code is mentioned as regulatory but no easily accessible link to it is provided.	Provide a link to the pertinent section of the Coastal Zoning Code.
		20		Entire 2nd para	"Additional resource.....may also be allowed...." , as well as the last clause placing the potentially permissible commercial tourism development <i>in</i> ESHA implies that a coastal development permit may be granted by the County.	Remove this paragraph.
	Commercial Tourist Designation Criteria	21			The stipulation that visitor-serving commercial uses would be "compatible" with "nearby" agricultural operations and uses is inappropriate, given the dearth of resources and infrastructure. The term "nearby" is not clearly defined.	Provide Criteria for compatibility. Define "nearby".
	Commercial Services	21	Permitted Uses	1st para	Lacking a link to the pertinent section of the Coastal Zoning Code.	Please provide link.
		21		2nd para	Given the potential for large-scale aquaculture and offshore wind turbine potential industry, in addition to other high-impact marine-related industry not yet imagined. Considering commercial fishing as the premier and potentially only supported industry.	Remove paragraph
		21-22	Building Intensity		Additional resource, residential, or community serving uses and structures accessory to and compatible with the primary use and consistent with the Local Coastal Program may also be allowed subject to permitting requirements of the Coastal Zoning Code. In addition, all uses requiring a Coastal Development Permit and principal permitted uses allowed in an environmentally sensitive habitat area, habitat buffer, riparian corridor, critical habitat area, major view, or cultural resource area shall not be considered principally permitted uses.(LCP202 LU CT Permitted Uses	Please clarify and restate as to intent.
		22	Commercial Services Designation Criteria (4)		"The amount of land shall be consistent with the population projected.....". There is a major discrepancy between the population increase projected by the "General Plan for the Sonoma Coast", which is in itself an inappropriate application, of "11,700 new residents by 2020" and the total population of 3,359 projected by Permit Sonoma GIS Community Profile for 2023.	Please correct the discrepancy using an updated, realistic population estimate.

	2.2.5 Public/Institutional Land Use	23	Permitted Uses	1st para	The construction of new rural residential housing is at odds with the fact that a substantial (35% has been speculated) of current housing in the coastal zone constitutes second homes or has been converted to vacation rentals. What is intended as "single family residential use" will likely be rapidly converted to vacation rental housing.	Add link. Include language that precludes conversion of single family dwelling units to Vacation Rentals.
				Entire 2nd para	Given the potential for large-scale aquaculture and offshore wind turbine potential industry, in addition to other high-impact marine-related industry not yet imagined. Considering commercial fishing as the premier and potentially only supported industry.	Delete this paragraph.
		23	Reuse of Public Properties		What is the purpose of County of reuse, disposal or acquisition of county properties? Please list examples of desirable properties for County purchase and for what purpose they would be acquired.	
			Building Intensity		General development of higher-density housing in an area with dwindling full-time resident population, an inadequate water supply, severely limited roadway access, overextended emergency services, etc, is insupportable. In addition, as stated above, a substantial percentage of available coastal housing is currently unavailable to local residents due to their vacation rental status.	

		24	Public Facilities Designation Criteria	1st para	<p>The threat of offshore oil drilling and other energy-generating industries has increased dramatically under the current Federal Administration. Stronger and broader interpretive language regarding onshore support of energy-generating offshore facilities must be included in the LCP, despite the existence of Sonoma County Ordinance #3592R, in order to avoid onshore support of wind or wave-energy technology and industry, especially in the tiny port of Bodega Bay. Per Richard Charter's letter to Cecily Condon on 2/16/20, "....2) Enhanced Onshore Industrial Facilities Ordinance Related to Offshore Drilling and Other Commercial Exploitation of the Ocean: During 2019, a new Administration in Washington, DC unveiled an aggressive new federal Five-Year Outer Continental Shelf (OCS) offshore drilling plan. This plan includes six offshore drilling lease sales extending along the entirety of the California coast, including two OCS lease sales proposed for the region inclusive of the Sonoma Coast. This offshore drilling plan is presently temporarily "on hold" due to a successful Court challenge brought by the conservation community and others. After November 2020, however, this offshore oil and gas leasing plan is expected to advance rapidly, with commensurate implications for our Sonoma Coast. Sonoma County voters in 1986 wisely adopted a ballot measure intended to help protect the Sonoma Coast from offshore oil and gas leasing by making our coastal lands inhospitable to the petroleum industry as it pursues the construction of onshore petroleum processing facilities and staging areas to support offshore drilling. The resulting Sonoma County Ordinance Number 3592R remains, as it should, appropriately embodied in the current Update of the LCP. Strengthening language to reinforce and improve this ordinance is now necessary, particularly given the fact that the northern expansion of the Greater Farallones National Marine Sanctuary that protects the Sonoma Coast from Bodega Head northward remains under review by the current Administration and, as a result, the permanent ban on offshore drilling within Sonoma County's nearshore coastal waters could be rescinded at virtually any time. Further, recent actions by the White House Council on Environmental Quality (CEQ) have substantially weakened the role of state and local governments in federal offshore drilling decisions affected by NEPA and CZMA, as noted herein. Strengthening the existing offshore drilling facilities ordinance in our county is also necessitated by the recent advent of offshore floating wind electrical generating turbine arrays and potential offshore wave energy devices. These emerging industries can be expected to lead to commercial proposals for, massive undersea electrical cable clusters connecting to other types of infrastructure and onshore facilities here that would also be equally incompatible with the non-industrial character of our communities. Bodega Bay represents the only fully-sheltering maritime port on this stretch of coastline, and therefore it could again become a target for</p>	<p>Strengthen the LCP language prohibiting onshore support of offshore energy generation. Note that the Greater Farallones National Marine Sanctuary encompasses the entire Sonoma Coast and that we host multiple Marine Protected Areas and the California Coastal National Monument. These areas should be accounted for and have impact on shoreline land use planning and proposed shoreline access points.</p>
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		25	<b>Rural Residential Areas</b>	<i>Permitted use</i>	The construction of new rural residential housing is at odds with the fact that permanent resident population shrinks while vacation rentals expand. Current levels of vacation rentals have created unaffordable housing for supporting workforce. Residents are leaving the coast averaging 1,000 a year. (comments: 53% from Gazette article can be quoted along with the supervisors stating in opening section of residential workforce loss. The 20% max in residential areas supported by Santa Cruz LCP that was certified).	Prohibit the use of Second Dwelling Units as vacation rentals. Prohibit the use of residences on rural lands as vacation rentals. Place a moratorium on any rural residential housing construction until the percentage of vacation rentals dwindles to 20% or less. See comments in Sections 3.2 through 3.4.1. Delete the 2nd paragraph. Insert after the first full paragraph: The tourism impacts on the Sonoma coast shall not use more than 20% of residential lodging (Santa Cruz LCP) in residential areas. Until such time vacation rentals reach targeted levels in residential areas, no new permits will be issued.
		26	Urban Residential Areas	Permitted Use, 1st para	"Medium Density Residential..... transitional and density bonus projects." What are "transitional" and "density bonus projects"?	Define these terms. Provide a link to the pertinent Coastal Zoning Code section.
					It would be useful to see a description of the number of people employed in the Coastal Zone, the income levels, and the distances that workers travel each day. In the absence of data, it is difficult to be confident that additional affordable housing will be sufficient, and to know how the jobs-housing balance will affect greenhouse gas emissions.	
					Approval of any increase in residential density is subject to specific findings regarding the adequacy of public services, consistency with the Local Coastal Program, and mitigation of impacts to coastal resources. Application of higher residential density under the density bonus or housing opportunity programs may require a Local Coastal Plan Amendment.	Add language that bonus density units will be required to be maintained as affordable into the future to the extent allowed by law. The terms of maintaining these units into the future are not discussed in this plan.
		26		2nd para	Specifically limit in nature and size any future industrial development in the coastal zone. Potential for large-scale aquaculture and offshore wind turbine potential industry, in addition to other high-impact marine-related industry not yet imagined. Considering commercial fishing as the premier and potentially only supported industry.	Delete
		27	Permitted Residential Density	2nd para	Correct language/grammar in the last sentence. Correct the listing of services to 3 restaurants (Aqua, Jenner Inn and River's End, both of which include independent cottages separated from the main buildings and resulting major traffic and safety issues due to pedestrian and motor vehicle congestion. Jenner is already at maximum carrying capacity. There are at least 3 licensed vacation rental businesses and numerous unlicensed ones operating in town already. Parking is at a premium and any new lodging, restaurants or retail shops would aggravate what is already an over-extended infrastructure.	

		27	Permitted residential density		Currently, criteria for development are inadequate, overestimated or speculation-based. For example, 2 hours of pumping and waiting to see how long it takes for flow to return to normal rates does not reflect effects on the surrounding water table, seasonal variations or realistic usage by a higher density of residents. Wells must show sustainable productivity. 16 or more residential units per acre, as suggested in this section, is not consistent with known limitations of the water table in Bodega Bay. Drilling new wells through the tidal zone (Bay Flat) in order to source water for developments is an unsustainable.	Drop the entire second paragraph.
		27	Designation Criteria		(3) "Adequate water, sewer, public safety, park, school services, and other necessary infrastructure are available or planned to be available." This language could allow unacceptable development approval by Permit Sonoma.	Drop the words "planned to be available". Map limits
		28	3. Land Use Policy: Outer Continental Shelf Development		Change first para to reflect an increased threat from the federal and state governments to drill for oil and/or initiate new offshore technology for energy generation (wind/wave turbines). Even "natural" energy generated offshore would require massive onshore support, underwater hazards and the end of the fishing industry on the Sonoma Coast.	The Sonoma County Local Coastal Plan prohibits general industrial and commercial energy development on the Sonoma County coast. Long-range protection of coastal agriculture, forestry, and commercial and recreational fishing; and an educational, residentially-balanced enhancement of tourism and recreation are the priorities of the Coastal Program. These priorities are considered to be incompatible with energy development or onshore support of such industry as a whole.
		29		Onshore and offshore oil and gas facilities	(4) Lands have convenient access to designated arterial or collector	Change section heading to "onshore and offshore energy generation facilities"
				2nd full para	One of the primary findings of the study is that no suitable sites exist on the Sonoma County coast for industrial onshore oil support facilities. The study indicates that onshore support facilities for offshore oil production are inappropriate due to a number of constraints, which include..... facilities.".	Prior to "constraints", insert: ...." <i>Any form of offshore energy generation industry.....would be inappropriate</i> due to...."
		30		1st para, last sentence		Change to ".....any potential offshore energy-generating industry would be limited to areas...."
		30		Goals, Objectives and Policies		All goals, objectives and policy language should be changed from "Oil and gas exploration and development" to ".....all forms of energy-generating industry, including oil and gas exploration and development as well as "alternative" forms of energy development, including wind and wave technology. "
				Policy C-LU-1.1	Discourage offshore oil and gas exploration and development off the Sonoma County coast	Change "Discourage" to "Oppose offshore oil and gas exploration and development off the Sonoma County Coast."

		30		Policy C-LU-1a	A Local Coastal Plan Amendment shall be required for any proposed onshore facility to support offshore oil and gas exploration or development. Any such amendment shall not be effective until a majority of the voters in Sonoma County, in a general or special election, approve the proposed amendment, unless such amendment is approved by the California Coastal Commission pursuant to Section 30515 of the California Coastal Act	Delete (unless such amendment is approved by the California Coastal Commission pursuant to Section 30515 of the California Coastal Act) or Insert ".....exploration or development, as well as any other form of offshore energy development."
		30		Policy C-LU 1b	Include all forms of onshore support	Prohibit onshore oil, gas and alternative energy support facilities within the Commercial Fishing land use category. (Existing LCP Revised)
	3.2 Community Policies	30			There are no overarching guidelines limiting urban or commercial service area boundaries. Zoning constraints to determine boundaries must be provided to avoid inappropriate use permits.	Delineate urban and commercial boundaries with local residents of each community in the coastal zone.
		30		last para	There is no mention that almost all of Bodega Bay lies within the Alquist-Priolo Zone of mapped surface earthquake faults. Per the California Department of Conservation: "Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault (generally fifty feet)." (See <a href="https://www.conservation.ca.gov/cgs/alquist-priolo">https://www.conservation.ca.gov/cgs/alquist-priolo</a> for map of Bodega Bay). This fact renders all goals, objectives and policies referent to Bodega Bay invalid as written.	
	3.2, Community Policies	30		Objective C-LU-2.2:	Balance residential and commercial development in Bodega Bay where adequate public services allow for residential and commercial expansion. Encourage a mix of price and rent levels."	Insert after the exiting Objective: "Residential development shall be given priority over commercial and tourism interests. Adequate public services requiring water use shall show no impacts to existing residential and commercial interests. A cumulative impact study shall be completed as a basis of tourism effects on climate change and scarce resources on the coast.
		31		1st full para	Current levels of vacation rentals have created unaffordable housing for visitor and residents' supporting workforce. Residents are leaving the coast averaging 1,000 a year. Until such time vacation rentals are down to acceptable levels in residential areas, no new permits should be issued. Plans to develop any form of housing on the coast, be it affordable or "mixed use" are inappropriate due to resource and infrastructural limitations.	See changes to Policy C-LU-2b
		31		Goal C-LU-2	"Protect the natural and scenic resources and the unique character and qualities of the Sonoma County coast by allowing new residential and commercial development only in appropriate areas at appropriate densities."	Insert: "...appropriate areas <b>outside the Alquist Priolo Zone</b> at targeted densities."

		31		Objective C-LU-2.2	Insert after "rent levels.":	Residential development shall be given priority over commercial and tourism interests. Adequate public services requiring water use shall show no impacts to existing residential and commercial interests. A cumulative impact study shall be completed as a basis of tourism impacts on climate change and our scarce resources.
		31	New	Objective C-LU-2.7		Prohibit intrusion of large structures and facilities into RRD and TP which compromise local fire fighting ability to provide fire suppression activities.
					There is no carry-over mention of creating historic districts at Duncans Mills, Valley Ford and Stewarts Point.	Recommend the formal recognition of Historic District Boundaries around not only Duncans Mills, Valley Ford and Stewarts Point but also at the other existing small coastal communities such as Salmon Creek, Carmet and Sereno del Mar.
		32		Policy C-LU-2b	"Encourage construction of new housing for low and moderate income households under the Density Bonus or Housing Opportunity Area Programs outlined in the Coastal Zoning Ordinance. Achieving a density higher than 4 units per acre under either Program may not require a Local Coastal Plan Amendment. (GP2020)"	Change to: Construction of new housing for low and moderate income households under any programs in the Coastal Zoning Ordinance is dependent upon coastal resource (eg, water) limitations and a vacation rental incidence of no more than 20%, the rest being made available as affordable housing. A Local Coastal Plan Amendment must be considered in any case of new housing. (See Santa Cruz LCP)
		32		Policy C-LU-2f	Fishing related industrial uses that require public services shall be located near Bodega Bay. Other fishing related commercial and industrial uses shall be considered coastal dependent uses. Clarify which parcels by AP number. Is there Industrial Zoned land "near Bodega Bay?" Is there a public auction on outside service connections for industrial fish related services? How do you analyze everything near Bodega Bay for purposes of your environmental analysis? You are creating a zoning and environmental exceptions based upon unknown factors.	Define "near".
		32		Policy C-LU-2g	Notwithstanding the provisions of the Public Facilities and Services Element, connection of sewer service to the Bodega Bay Public Utilities District shall be allowed for uses that directly relate to and support the fishing industry in Bodega Bay and that cannot be located within the Urban Service Area. An out-of-service area agreement shall be used in such cases. Conflicts with Ag Resources Element policies 2.2, pg. 10 Objective C-AR-2.2: Maintain the Bodega Bay Urban Service Area Boundary and Rural Community Boundaries to protect agricultural land for continued agricultural production. Objective C-AR-2.3: Limit extension of sewer and other urban services beyond the Bodega Bay Urban Service Area Boundary and Rural Community Boundaries.	Delete this policy. Please be clear of intent. Probably violates State law, LAFCO policy, Public Health and other County policies. Doesn't specify the parcel has to be contiguous to the BPUD. If there is a parcel that may in the future meet this criteria, name the parcel (s) by #AP and note in LCP they may apply in the future for GP amendment, LCP amendment and annexation to the BPUD. What uses are directly "relate to and support fishing" that can't be in the USB? A restaurant selling local fish? Boat yard? Net making? If there is a parcel that may in the future meet this criteria, name the parcel(s) by #AP and note in LCP they may apply in the future for GP amendment, LCP amendment and annexation to the BPUD. Otherwise, this is an invitation for endless speculation

		32		Policy C-LU-2m	Water and sewer extensions to parklands outside urban boundaries, as with Policies C-PF-2 b and e, is antithetical to the intent of the Coastal Act to protect natural resources. It invites extra-urban development. It is impractical, and was taken from the GP referring to cities etc with extensive sewage and infrastructure. There is only one road to and through Bodega Bay, State Hwy. 1. This 2-lane road not only serves Bodega Bay, it is the gateway to the North Coast and traffic constraints have already reached persistent gridlock for the community and for those seeking recreation from the beaches to the north. The need for low income housing for its residents and those working in the fishing and hotel industries cannot be overstated. Houses are priced out of the range of most of those wishing to live and/or work in the area. Long-term rental housing no longer exists to the extent needed and those who seek work in the existing industries must now commute to neighboring cities putting more and more stress on the existing traffic constraints.	Water and sewer service extensions to public parklands outside of Urban Service Areas may be allowed only where consistent with the Public Facilities and Services and Public Access Elements. (Existing LCP Revised)
		33		Policy C-LU-2l		
		33		Policy C-LU-2m:	What is an "urban service area" in an unincorporated rural area? This is not practical nor appropriate to the coastal zone and appears to have been taken directly from the GP, referring to cities, etc, with extensive sewage and infrastructure. Bodega Bay has never had a plentiful water supply. The last time a PUD well was dug, the water was diverted to a private development and the water table dropped in nearby bird ponds. Bodega Bay also has limited sewer and wastewater treatment facilities, prohibitive to new development of any capacity. At this time, wastewater is used to water the golf course and overflow from settling ponds is released into the Bay and Johnson Gulch.	Strike this policy from the document.
		33		Policy C-LU-2n	How can you have a Land Use element and negate it with a Public Services element? If there is specific development on specific parcels, it should be noted, not left to willy nilly application. How can you do environmental analysis as per this policy for the LCP not knowing a)how many parcels are eligible for "development proposed for areas beyond those boundaries" would be considered) what the uses are and c) project impacts as a cumulative impact to the LCP in toto?	Provide for commercial development only within designated Urban Service Areas and Rural Community boundaries, except where development proposed for areas beyond these boundaries would be consistent with the Public Facilities and Services and Public Access Elements.

	3.2.2: Bodega Bay	39	Background		The population figures used do not reflect current data, Harbor View Subdivision was not completed in 2005. Only the affordable units, Harbor View Village, have been completed. The water supply information is inaccurate as to existing and future water supply and facilities and does not take into effect the future rise of sea level and climate change. Bodega Bay faces impacts from the proliferation of the vacation rental industry.	Update data and impacts to reflect current circumstances.
	3.2.2: Bodega Bay	39	Background	page 40 2nd paragraph, 2nd sentence	Description of traffic in Bodega Bay needs updating..."Traffic congestion is already severe on summer weekends through Bodega Bay. Traffic volumes on State Highway 1 will continue to increase through Bodega Bay due to increases in general recreational traffic on the coast.	Change to " Due to increases in recreational visitation, traffic congestion now occurs year-round, is greater during holidays and weekends and will continue to increase and worsen the existing congestion. "
		40	Background,	3rd para	See LCP language: "The "new Sand Dunes Well, [constructed 13 years ago], has not resulted in an overall addition of 50% more water to the general residents of Bodega Bay. The Bodega Bay Public Utilities District provides water supply and wastewater treatment. Water supply is a constrained to development at Bodega Bay. Water supply is adequate for existing and some additional development....."	Drop the last portion of this paragraph beginning with "The new Sand Dunes Well...."
		42		Policy C-LU-4c	New development proposed within the Bodega Bay Urban Service Area shall require the applicant to provide evidence in the form of a letter from Bodega Bay Public Utility District of an adequate water supply to serve the development. If an adequate water supply is not available to serve all planned development, development shall be limited by implementing a system for allocating building permits according to the available water supply, or the development shall be contingent upon provision of additional water supplies. Provision of "additional water sources" is unrealistic in this area of low groundwater tables.	Priority of water supplies shall be given to residential customers and not vacation rental properties or commercial interests, in order to promote affordable workforce housing. Occupation of a vacation rentals shall not result in annual domestic water use greater than that associated with the non-VDU use of the residence based on an average daily consumption of 150 gallons per bedroom (7,324 cubic feet per year per bedroom) with a 30% allowance for landscaping above the design flow. Rentals shall be allocated no more than 100 gallons of water per bedroom and 30 gallons for landscaping per day [Trinidad, Humboldt LCP].
				42		
				43		
					The major goal of the Housing section is to protect and promote low and moderate cost housing for people who work within the coastal zone to carry out Coastal Act policies on housing, access, and coastal zone priority uses.( 1981 LCP Housing, VI-2,1)	Retain this language in Affordable Housing Policy 3.3 p.43. Affordable housing should target workers and families in the CZ to extent legal.
		45		Objective C-LU-5b	Currently, it has been estimated that approximately 35% of all housing is vacation rentals which inhibit affordable workforce housing. (Insert Santa Cruz LCP language, approved by the Coastal Commission).	Insert Goal: Preserve and enhance affordable housing opportunities on the Sonoma County coast by enforcing a moratorium on vacation rentals until such time that no more than 20% of housing is for residential use.
		47		Policy C-LU-5k	Require long-term Affordable Housing Agreement for affordable housing units. Permanent? How long is long term? Any guidelines on intent?	Please change language to specify term, strength, and intent. We have lost too many affordable housing to inexact language.
	3.4.1 Existing Visitor-Serving Commercial Facilities	50		Jenner	Jenner No new visitor-serving facilities may be developed due to inadequate water supplies, as well as limited parking availability. Currently, the coffee shop and gas station serve more tourists, on average, than locals	No new visitor-serving facilities may be developed

		53		Policy C-LU-6b		Add: "No Visitor Serving facilities may be located in RRD when road width is less than that required of a Rural Local Road (See Glossary)
		54		Policy C-LU-6d	[Solano Beach has 7 days, Imperial County has a 30 day minimum for vacation rentals]. In 2017 River Watch v Sonoma County the Superior Court ruled against Sonoma	Insert: Such policies will not go into effect until such time as balance is obtained between residential housing and vacation rentals (20%) thereby encouraging more affordable housing and availability of workforce to support the area. To support climate change impacts associated with tourism and affordability for residents/workforce, minimum rental shall be for 7 days.
		54			Affordable housing for local commercial service workers and those involved in the fishing industry is the only category of housing that is still needed on the coast. If all infrastructural criteria are met, any new housing construction should be designated for occupancy by that population and maintained as affordable into the future to the extent allowed by law.	Change to: Any new urban housing construction in the coastal zone must be required for services reflecting a balance of local residents' quality of life interests with those of non-residents, such as tourists. Any construction must be quantifiably supportable by existing and projected future resources (eg, water, access, emergency services, etc). No impacts to biotic or viewscape coastal resources will be permitted.
		54		Policy C-LU-6e		Eliminate: " , including bed and breakfast accommodations in existing homes") as 7 night minimum on vacation rentals shall be mandated to create affordable housing and mitigate to the greatest extent climate change impacts.
		55		Insert under Program C-LU-1:		Insert new Policies: C-LU-7a: One off-street parking spot per bedroom and 2 cars maximum per bedroom in vacation rental properties. [Trinidad LCP] shall be required in residential areas to reduce traffic congestion and GHG. Policy C-LU-7b: A sign of not more than 3 by 3 feet shall be required on vacation unit with phone number and contact information for complaints. [Santa Cruz LCP] Policy C-LU-7c No vacation rentals with common walls without a signed agreement with other residents. [Santa Cruz LCP] Policy C-LU-7D To support climate change impacts associated with tourism and affordability for residents/workforce, minimum rental shall be for 7 days. [Solano Beach has 7 days, Imperial County has a 30 day minimum for vacation rentals]. Policy C-LU-7E All vacation rentals shall be licensed and regulations enforced by means of implementable fines [California Senate Bill 1049 allows cities to fine rental hosts up to \$5000 per violation.] Property owners/management that has repeated violations shall have the license revoked for not less than one year.
	Program C-LU-3	56				Add Policy C-LU-8A: Issue parking permits for residential priority uses with appropriate signs.
	4.2 Other Initiatives	30			Insert at end of Initiative CLU-5:	Expand collection of data on visitor use of public access facilities and the methods used for monitoring visitor use patterns, to mitigate tourism-based resource consumption and pollution exacerbating climate change.

	3.3 Affordable Housing Policy	43				
		45		Objective C-LU-5b	"Promote the development of affordable housing to meet a range of for-sale and rental housing needs including agricultural employee housing, accessory dwellings, senior housing and accessible units."	Affordable housing for coastal residents shall prioritize local workforce needs. <i>Promote the conversion of vacation rentals to affordable housing.....accessory units."</i>
	3.4.1 Visitor Serving Commercial Facilities Policy	48				
	3.4.1 Existing Visitor Serving Commercial Facilities	50		Last para: Jenner	Correct language/grammar in the last sentence. Correct the listing of services to 3 restaurants (Aqua, Jenner Inn and River's End, both of which include independent cottages separated from the main buildings and resulting major traffic and safety issues due to pedestrian and motor vehicle congestion.	Change last sentence to: "Served by a mutual water system, Jenner has a moratorium...". Recommend a moratorium on any further development on visitor-serving commercial facilities in light of existing infrastructural inadequacies and public safety hazards.
4. Implementation Programs	4.1 Land Use Implementation Programs	54		Program C-LU-3a		Issue parking permits for residential priority uses with appropriate signs.
	4.2 Other Initiatives	56		Program C-LU5		Insert at end: Expand collection of data on visitor use of public access facilities and the methods used for monitoring visitor use patterns, to mitigate tourism based resource consumption and pollution exacerbating climate change action.
List of Tables						
Figures (Land Use Maps)	C-LU 1a thru k			All	The maps are inaccurate. One example is Sub Area 8, in which the Willow Creek Unit of Sonoma Coast State Park is shown zoned for timber. In addition, there are no dates or comparisons with previous maps, which implies that all of these maps are at least 20 years old and not a basis for informed public comment on the LCP Draft.	Re-do all the maps in the Land Use Element to reflect the current year.



Element	Section	Page	Comment Page	Comment Section	COMMENT	Change To
<b>Agricultural Resources</b>						
					Please Include current standards & requirements: <a href="https://documents.coastal.ca.gov/assets/agriculture/Cannabis-Information-I-Document-4.29.19.pdf">https://documents.coastal.ca.gov/assets/agriculture/Cannabis-Information-I-Document-4.29.19.pdf</a>	See CCC Cannabis link
					Where is the "Ag Preserves" section, or a mention of The Williamson Act, in the Updated LCP Agricultural Resources Element section? The section from the 2008 LCP: "Agricultural Preserves - Many landowners in the Sonoma coastal zone have demonstrated a commitment to agriculture by entering into Williamson Act contracts. The California Land Conservation Act of 1965 (the Williamson Act) allows counties to establish agricultural preserves and thereby give tax reductions to landowners engaged in commercial agricultural operations. Under current law, lands under contract are appraised by the county assessor for their agricultural productivity rather than market value. When an agricultural preserve is formed, State law requires all lands in the preserve to be zoned to prevent land uses incompatible with agriculture within the preserve. In signing a contract with the County, the landowner agrees to retain his land in agricultural uses for at least ten years."	
1. Introduction	1.1 Purpose	1	1.1	Para 3	add to last sentence	".....County's economy, while preserving the unique and fragile visual and natural resources of the coastal zone."
				Para 4	Changes to last sentences:	"With climate change, extremes such as drought, future vineyard development shall be prohibited in the coastal zone."
	1.2 Relationship to Other Elements	2		Para 2	Farmland of Local Importance appears to be ambiguously defined in the Glossary as whatever the Board of Supervisors says it is. If it is included, it should be more specifically defined and exclude cannabis or alcohol crops, as they are intrinsically not of "Local Importance". Soil types should be considered.	
					Add ...	".....rests with the Board of Supervisors in collaboration with local residents in Sonoma County."
	1.3 Scope & Organizations	4			Adding as last sentences	No tasting rooms or visitor facilities shall be permitted in Williamson Act properties. Where future non-cannabis/non-alcohol row crops are considered in areas of known or potential water scarcity, perc testing shall be performed for one year prior to conversion to assess feasibility and potential effects on adjoining properties' water tables.
2. Background	2.1 Residential Subdivision Potential & Nuisances	5				
	2.2 Conversion of Agricultural Uses	5	5	2.2	Add to last sentence:	The application of synthetic pesticides shall be prohibited.
	2.3 Agricultural Support Uses	6		2.3.1	Add to end of last sentence:	".....customers shall be prohibited in the coastal agricultural areas and limited to commercial areas...."
					Policies are needed to permit agricultural support uses without adversely affecting production of agricultural products in the area and impacting community character	
	2.3.1			2.3.1		Activities such as special events and tasting rooms that attract large numbers of customers are not considered appropriate in the coastal agricultural areas and are limited to the commercial areas within rural communities." (Delete word "Considered")
				2.3.1	Benefits of agricultural tourism must be balanced against Vehicle Miles and Greenhouse Gas Emissions as well as potential adverse impacts on public safety. We support large events being inappropriate. It would be good to specify a limit to farm stays It should be pointed out that fruit trees can be grown close to the coast. An example is the Fort Ross orchard where apple and pear trees were still producing after more than 100 years. Climate change may make this more attractive. particularly for diverse farms marketing locally. Both grapes and fruit can be dry farmed in cool areas with adequate soil depth so a shortage of water is less of a limitation.	
	2.4 Farmworker Housing	7				
	2.5 Farmers' Economic Situation	7				
	2.6 Aquaculture	7	7	2.6	Add as last sentence	"No GMOs, antibiotics, or adverse effects on local marine biota or ESHAs shall be permitted in the production process."
			7	2.6	Aquaculture and fishing industry should not be equated as aquaculture is the rearing and cultivation of aquatic animals or aquatic plants for food, while fishing is the catching of fish for food or sport. (OPEN SPACE AND RESOURCE CONSERVATION ELEMENT-Section 4 deals with Commercial Fishing and Support Facilities Policy-Section 4 Page 34)	Aquaculture produces a food source and has support needs similar to land based agricultural operations. Policy is needed to regulate the practices and support facilities of the aquaculture industry. Definition of Aquaculture, from the NOAA, "Aquaculture is a method used to produce food and other commercial products, restore habitat and replenish wild stocks, and rebuild populations of threatened and endangered species. There are two main types of aquaculture—marine and freshwater."
	2.7 Impacts of Climate Change	7	8	2.7	Add as last sentence	"All policies shall include and reflect current climate change studies and include implementation strategies to prevent and/or adapt to impacts."
3. Agricultural Resources Policies	3.1 Maintain Large Minimum Parcel Sized in Agricultural Lands	8	8		include consideration of green houses	
			8	GOAL C-AR-1	The last three words are not bolded, though the rest of the paragraph is.	
			9	C-AR-1a (3)	Couldn't find the minimum size under 30241.5 but bet we think smaller parcels should be allowed.	
			9	C-AR-1b	Planting trees in and around crops is an important method of sequestering carbon.	Remove the word "either". Planting trees in and around crops is an important method of sequestering carbon.
			9	C-AR-1e	50 percent threshold could speed up the development of ag lands	

	3.2 Limit Intrusion of Urban Development		10	C-AR-2b	Include consideration of green houses which do not rely of the capability of the soil	
			11	C-AR-3a & C-AR-3c	these seem redundant	
			10	Goal C-AR-4:	Goal C-AR-4: Facilitate agricultural production by allowing related agricultural support uses (agricultural processing and agricultural services), to be conveniently and accessibly located in agriculture production area when related to the primary agricultural production in the area.	Change "...in the area." to "...within the Coastal Zone."
	3.3 Location & Intensity of Agricultural Related Support Uses		11	Objective C-AR-4.2	Add as last sentence	"Agricultural support shall be permitted only for products grown in the immediate area (eg, not for products imported from outside the coastal zone)."
				C-AR-3 or C-AR-4c		<i>tighten up to: Processing of agricultural products limited to on site production.</i>
	3.4 Farm Related Housing		13			
	3.5 Support Agriculture Economic Viability		14	Objective C-AR4.3	States direct linkage to product location and proportion	
				C-AR-6b		change from "... conserve energy to conserve or generate energy, protect water and farm the soil to sequester carbon in order to bolster the local food economy, minimize climate warming, increase...."
				C-AR-6c		Encourage alternative energy production such as solar panels and wind machines. Wind machines should not be installed where they block scenic views from public lands.
	3.6 Aquaculture		15			
			15	Goal C-AR-7	Does "fish" include shellfish? Should the word "Aquaculture" be included in the goal? Is harvesting of water-growing plants for sale as a food or other product included in this document?	Provide for the raising, harvesting and production of shellfish or aquatic plants in a manner which does not disrupt wildlife and marine habitats, or unreasonably harm the ability of the marine environment to support ecologically significant flora and fauna or present significant adverse cumulative impacts.
				C-AR-7b	Support facilities for the fishing industry, including but not limited to equipment storage, processing facilities, and canneries may be allowed on lands designated for agricultural land use adjacent to the Urban Service Boundary of Bodega Bay. If the facility or use requires urban services, extension of such services on lands adjacent to the Urban Service Boundary may only be permitted for that purpose. Ensure that such uses are clearly subordinate to on-site aquaculture production and do not adversely affect agricultural production in the area. The following criteria shall be used	Delete " processing facilities" and canneries" may be allowed A substitute policy might be: "County should consider underwriting critically needed process or fishing support services by use of tideland lease areas and pursuit of grant monies." Delete: If the facility or use requires urban services, extension of such services on lands adjacent to the Urban Service Boundary may only be permitted for that purpose. Ensure that such uses are clearly subordinate to on-site aquaculture production and do not adversely affect agricultural production in the area." A substitute policy might be: "County should consider underwriting critically needed process or fishing support services by use of tideland lease areas and pursuit of grant monies." Delete (5)
			15	Objective C-AR-7.1		Regulate aquaculture and its related facilities and activities in agricultural areas.
			15	Objective C-AR-7.2	Objectives C-AR-7.2 & 7.3 do not belong in the section on Aquaculture and instead should be moved to (OPEN SPACE AND RESOURCE CONSERVATION ELEMENT-Section 4 which deals with Commercial Fishing and Support Facilities Policy-Section 4 Page 34)	Provide opportunities for development of support facilities for the fishing industry on appropriate lands.
			15	Objective C-AR-7.3		Promote products of the fishing industry in the same manner as agricultural products
			15	C-AR-7a		<del>Outdoor aquaculture shall be permitted in the same manner as other agricultural production uses. (GP2020) – Remove this</del>
			15	C-AR-7a	Aquaculture has unique practices which impact the marine environment and permits/leases are regulated by Specific State & Federal laws and regulations pertaining to aquaculture and its administration which are found in Chapters 1 through 8 of Division 12 of the Fish and Game Code (commencing with section 15000) and the provisions of Chapter 9 of Division 1 of Title 14, California Code of Regulations. Numerous state agencies such as Department of Fish & Wildlife, Regional Water Quality Control Board, State Lands Commission, & Coastal Commission have jurisdiction as well as NOAA, U.S. Army Corps of Engineers, Coast Guard, & National Marine Fisheries Service.	Aquaculture permits/leases are regulated by Specific State & Federal laws and regulations pertaining to aquaculture leases and its administration which are found in Chapters 1 through 8 of Division 12 of the Fish and Game Code (commencing with section 15000) and the provisions of Chapter 9 of Division 1 of Title 14, California Code of Regulations. <b>Specific regulatory policies should state:</b> Prior to issuance of any permit for a land based or public land/water aquaculture facility utilizing either marine, brackish, or freshwater intake & discharge, the applicant must show that the operations will not reasonably interfere with fishing or other uses of public trust values, unreasonably disrupt wildlife and marine habitats, or unreasonably harm the ability of the marine and estuarian environment to support ecologically significant flora and fauna. Prior to issuance of any permit for a land based or public land/water aquaculture facility utilizing either marine, brackish, or freshwater intake & discharge, a permit must also evaluate adverse cumulative impacts. Prior to issuance of any permit for a land based or public land/water aquaculture facility utilizing either marine, brackish, or freshwater intake & discharge, the applicant must present evidence that the applied for aquaculture area had been registered and in compliance with aquaculture permit or lease requirements of California Department of Fish and Wildlife, California Department of Public Health, Regional Water Quality Control Board, State Lands Commission, United States Army Corps of Engineers, Tribal governments, & California Coastal Commission. If the facility will utilize or discharge into the marine or estuarian environment that is within the boundaries of the Greater Farallones National Marine Sanctuary or would pose a possible impact to the Sanctuary, then the applicant must also show compliance with their permit requirements. Prior to issuance of any permit for a land based or public land/water aquaculture facility utilizing either marine, brackish, or freshwater intake & discharge, the public must be reasonably notified and provided with meaningful opportunity to comment.
			15 & 16	Policy C-AR-7b	Policy C-AR-7b conflates aquaculture and fishing industry. Policy related to fishing industry support facilities should be contained in section OPEN SPACE AND RESOURCE CONSERVATION ELEMENT-Section 4 deals with Commercial Fishing and Support Facilities Policy-Section 4 Page 34 only and not within the Aquaculture Policy or Objective section of the LCP as fishing is not agriculture.	First sentence of this policy needs to remove "Support facilities for the fishing industry" and substitute "Support facilities for the Aquaculture industry"

			15 & 16	Add Policy C-AR-7c		The cultivation of aquatic plants and animals must be in the public interest and any issuance or renewal of permits requires a public hearing conducted in a fair and transparent manner, with adequate notice and opportunity for public comment
			15 & 16	Add Policy C-AR-7d		All permits must be used for the purpose intended and are species specific.
4. Implementaion Programs	4.1 Agricultural Resources Implementation Programs	16				
	4.2 Other Initiatives	16		C-AR-5		After "conserve energy" add: "sequester carbon"
List of Tables	C-AR-1 Acreage of Important Farmlands by SubArea on the Sonoma County Coast	3				
	C-AR-2 Minimum Parcel Size & Maximum Residential Density by Agricultural Land Use Category	9				
	C-AR-3 Agricultural Uses & Support Uses Allowed & Permit Thresholds	12		Policy C-AR-4b	Change 1st two sentences to	"...shall be permitted only for agricultural products grown on site. No storage or processing of imported products shall be permitted."
			12	Table C-AR-3	Add 3rd note to Principally Permitted Use	"Vineyards principally permitted shall be dry-farmed due to water scarcity in the coastal zone."
			P13		Add policy C-AR-3d:	No agricultural product not produced in the Coastal Zone is allowed to be sold at farm stands or as retail products in DA, RRD and LIA zoned lands.

Element	Section	Page	Comment Page	Comment Section	COMMENT	Change To
<b>Open Space &amp; Resource Conservation</b>						
1. Introduction	1.1 Purpose	1		first paragraph	"State law recognizes that open space land is a limited and valuable resource which must be conserved wherever possible. The Open Space and Resource Conservation (OSRC) Element of the Local Coastal Plan must address open space for the preservation of natural resources; for the managed production of resources; for outdoor recreation; for public health and safety; and for the preservation of archaeological, historical, and cultural resources." <i>These words are incompatible with the concept of Open Space and Resource Conservation.</i>	Drop the words "wherever possible" in the first sentence and the words "managed production of resources". Then change to: ".....open space for the <i>conservation and restoration</i> of natural resources.....cultural resources". Modern science shall provide guidelines and best practices for carbon sequestration and climate change mitigations throughout this Element.
		1	1	2nd para	"The purpose of the Open Space and Resource Conservation Element is to preserve the natural and scenic resources which contribute to the general welfare and quality of life for the residents of the Sonoma County coast and to the maintenance of its tourism industry. This Element provides the guidelines for making necessary consistency findings and includes an implementation program, as required by law."	Change first sentence to: ".... Sonoma County Coast and to maintain a science-based balance of tourism activities with current and future ecosystem and natural resource limitations.
		1		Add 3rd para:		When human activities may lead to (or should be considered as possible consequences of) actions that may damage or harm human or other living organisms' health through the neglect, damage, destruction, or elimination of individuals or populations, or their habitats and physiological, behavioral, or ecological requirements, such actions shall be suspended until ample scientific evidence and ethical consideration can be applied to determine the least harmful course of action. Consideration of must be extended to future generations of all species that might be affected, even indirectly, regardless of any apparent physical disjunction."
	1.2 Relationship to Other Elements	1	1-2	entire section	There is no strike-through comparison with the current LCP to refer to in this re-organized draft version of the OSRC Element, nor of the document in its entirety. The "Policy Comparison Tables" do not relate adequately the changes between the Draft and the current LCP. The description here of how the Elements relate to each other is an additional source of confusion rather than an aid to meaningful public comment.	Provide a side-by-side summary of comparisons of this Element to the current LCP.
	1.2 Relationship to Other Elements	1		1.2 (1)	"Dredging operations" are unspecified. It should be specified under what circumstances, what locations and what environmental guidelines will be followed.	Refer to the Marine Sanctuary guidelines, which Sonoma County collaborated to develop.
				1.2	"2) The Open Space and Resource Conservation Element includes policies that address management of mineral, timber, and energy resource production; and support facilities for the commercial fishing industry."	This is confusing placement of commercial production and commercial industry policy in the OSRC Element, and creates confusion for citizens seeking to comment. These policies should be located under Land Use, not in Conservation. Likewise, Agricultural and Water resource policies should be integrated into their particular Element sections.

	1.3 Scope & Organization	3			"The OSRC Element contains a policy framework for the preservation of open space and conservation of natural resources and an Open Space Map designating lands subject to various policies."	There is no "Open Space Map" extant in the Draft, Appendix or Figures. Please provide one, with a link.
2. Scenic & Visual Resource Policy						
	2.2 Scenic Landscape Units & Vista Points	4		2.2.1, 2nd sentence	"Preservation of these scenic resources is important to the quality of life of Coast residents and the tourists and agricultural economy.	Change to: "...coastal residents, tourism and our agricultural economy."
			4	2.2	Scenic "landscape units" and vista points planning must reflect that scenery is a 360-degree experience and includes the entire land and seascape visible from any given point.	
			4-5	2.2.3	"Designated Vista Points should be developed with safe ingress and egress, parking areas, interpretive signs, and restrooms where appropriate." This proposal to develop formal Vista Points with ingress, egress, parking spaces, parking, interpretive signage, etc, is inconsistent with maintenance of an undeveloped view, not to mention the geologic reality of cliff and bluff erosion, especially in view of accelerated climate change and the limited capacity of Hwy 1 and emergency response.	Change to: "Existing viewpoints/parking areas which already have capacity for enhanced amenities may be developed, with safe ingress.....", etc.
			5	Goal C-OSRC-1	"Retain the largely open, scenic character of Scenic Landscape Units and views from Vista Points."	
			5	Objective C-OSRC-1.2 and 1.3	"Protect the ridges and crests of hills in Scenic Landscape Units and views from Vista Points from the silhouetting of structures against the skyline." "Protect hills and ridges in Scenic Landscape Units and views from Vista Points from visible cuts, fills, and vegetation removal." These objectives wrongly assume that there will be development in Scenic Landscape Units.	These objectives should be removed in their entirety and the following language substituted: Objective C-OSRC-1.1: "Scenic landscape units shall not be developed with structures or visible road cuts, vegetation removal or fill."
			5	Policy -OSRC-1a	This is an inappropriate application of General Plan 2020 and does not define the term "Scenic Resources Combining Zoning District". There should be no new construction of agricultural structures in any areas of visual impact. Allowing non-compliance with aesthetic guidelines based on "affordability" issues is unacceptable.	
			5	Policy C-OSRC-1b	"Development which will significantly degrade the scenic qualities of Scenic Landscape Units and views and from Vista Points shall be prohibited. (Existing LCP Revised)"	Change the words: "...will significantly degrade..." to "will at all impact".
			5	Policy C-OSRC-1d	"Amendments to increase residential density in Scenic Landscape Units in excess of one unit per ten acres shall be avoided."	Change "avoided" to "prohibited".
			5	Policy C-OSRC-1e	"Commercial or industrial uses in Scenic Landscape Units other than those which are permitted by the agricultural or resource land use categories shall be avoided. (GP2020)"	Change "avoided" to "prohibited".
			6	Policies C-OSRC-1g	The following standards shall be used in addition to those of Policy C-OSRC-1f for new subdivisions within Scenic Landscape Units, other Major Views, and views from Vista Points", etc. Sub-policies (1) through (4) are in conflict with the entire concept of preserving Scenic Landscape Units. New housing developments are an a priori visual blight. There is no visual mitigation possible.	Both policies should be stricken from the Draft.

	2.3 Scenic Corridors	6	6	First sentence	"Many residents of Sonoma County highly value the beauty..."	Change to "Residents of Sonoma County...."
			6	2nd para	Preserving these landscapes is important to preserving the character of the coast. The primary impression of any area on the Coast comes from what is seen while driving, cycling, or hiking along a roadway. One of the most effective methods of protecting visual resources is to protect scenic corridors along a system of scenic roads. Designated Scenic Corridors on the Sonoma Coast are State Highway 1, Stewarts Point- Skaggs Springs Road, State Highway 116, Coleman Valley Road, Petaluma-Valley Ford Road, Bodega Highway, Fort Ross Road, Meyers Grade/Seaview Road, Bay Hill Road, and a paved portion of Willow Creek Road.	Scenic Highway status should be secured ASAP for Highway 1.
			7	Policy C-OSRC-2a		Define terms and provide a link to the "Scenic Resources Combining Zoning District". Not explained adequately for public comment.
			7	Policy C-OSRC-2b:	"Continue to protect the unique scenic qualities of Highway 116 as outlined in the September 1988 116 Scenic Highway Corridor Study. (GP2020) "	Provide a link to the cited study
			7	Policy C-OSRC-2c	"Outside of rural communities and urban service areas, the minimum setback of a new structure from a Scenic Corridor shall be 30 percent of the depth of the lot to a maximum of 200 feet from the centerline of the road. (Existing LCP Revised)"	Provide a link in the Draft text to the "Existing LCP" text, so the public can see the revision side-by-side.
			7	Policy C-OSRC-2f	"Public works projects shall be designed to minimize damage and removal of trees along Scenic Corridors. Where trees must be removed along highways, replanting programs shall be designed so as to accommodate ultimate planned highway improvements. Replanting and revegetation shall be required following grading and road cuts. (GP2020)"	Please define and give examples of "public works projects", and "ultimate planned highway improvements. Add the sentence: "Sonoma County voters shall be given advance notice of any public works projects and planned highway improvements and shall participate in their design.
	2.4 Outdoor Lighting	7		First paragraph	Appropriate light levels for varying uses should be balanced with a desire to maintain Sonoma County's rural character and preserve views of the night time skies for residents and visitors.	Change to ".....should be minimized.....to maintain Sonoma County's....."
			7-8	Second para	"A related issue is the effect of artificial night lighting on biological resources. Natural patterns of darkness and light are essential to the functioning of ecosystems. Artificially lighting the nighttime sky may have serious negative consequences for the ecosystem, termed ecological light pollution."	Change to: "Artificially lighting the nighttime sky <i>has</i> serious negative consequences....", rather than "...may have serious consequences..."
			8		Artificial night lighting affects the natural behavior of many flora and fauna species. It can disturb development; feeding, mating, resting, migration, and other activity patterns; and hormone-regulated processes, such as internal clock mechanism.	Change last line to: ".... processes, such as a <i>creature's</i> internal clock mechanisms."
			8	Objective C-OSRC-3.2	"Ensure that night time lighting for new development is designed to avoid light spillage offsite or upward into the sky."	Drop the words "....for new development". Add: "Existing lighting shall be required to avoid light spillage at the time of replacement."
			8	Policy C-OSRC-3a:	"All new development projects, County projects, and signage shall be required to use light fixtures which shield the light source so that light is cast downward, and that are no more than the minimum height and power necessary to adequately light the proposed use. (GP2020)"	Change to: "All new projects as well as upgrades of old lighting, shall be required.....downward, to avoid offsite light spillage.....", etc.

2.5 Community Character & Design	9		1st para	"New development should enhance and retain the unique character of unincorporated communities. Successfully integrating community amenities such as attractive streets, safe bike and pedestrian access, attractive and long-lasting buildings, inviting public spaces, and important natural and cultural resources will make developed spaces more livable." This does not appear to include community assent.	Change to "Any new development regarded as desirable by residents, infrastructurally supported and consistent with the character of the community will enhance the quality of life for that community."
		10	1st para	Developing design guidelines for the Coast must be done in a way that recognizes local character. Community design guidelines which avoid increased urban development in rural areas and promote integrating attractive new development with the surrounding landscape, will benefit not only property owners and developers but all who live in and visit the coast	Drop the latter portion of the para, beginning with: "Community design guidelines....." which implies that benefitting developers by approving new development in rural residential landscape is good for the coastal zone.
		10	2nd para	"These large lot subdivisions, have a strong impact on community aesthetics."	Remove the comma after "subdivisions".
		10	4th para	This paragraph implies development in the smaller communities between Bodega Bay and Sea Ranch. They are seen as ripe for further development. First, there is a serious water shortage in the coastal zone. Second, suggesting that new development, if it is possible at all, have "minimal aesthetic impact" is an oxymoron in an area of scenic vistas.	
		12	Jenner	Mention should be made of the serious water shortage and single common community water source in Jenner.	
		15	2.5.5 Community Character and Design Policy	".....while accommodating projected growth and housing needs". There is no definition of terms and no demonstrated need or justification for further growth in the coastal zone, except for housing support for existing service workers and fishing. There is no infrastructure to support such needs.	
		16	Policy C-OSRC-4a	"Design review shall be required for all new development outside of Urban Service Areas and Rural Community Boundaries. The Director of Permit Sonoma may waive this requirement on parcels not visible from and east of State Highway 1. (Existing LCP Revised)"	This kind of discretionary power by the Director of Permit Sonoma invites corrupt practices. The second sentence should be struck from the draft.
		16	Policy C-OSRC-4-D2	This suggests that good aesthetics will be "encouraged" ....for "new, heavy commercial structures", without definitions, specifics or developer accountability.	

3. Biotic Resources Policy	3.1 Background		17		<p>The Sonoma County Coast is rich in natural resources. It supports over 15 types of upland, wetland, riparian, coastal, and open water habitats that support over 30 animal species and 48 plant species that are designated as rare, threatened, or endangered and are protected under state and federal laws and regulations. Use of the coastline by shorebirds, seabirds, and waterfowl, as well as numerous terrestrial and marine mammals, reptiles, and amphibians has been documented over the last several decades. The Biotic Resources section of the Open Space and Resource Conservation Element provides a general inventory of biological resources on the Sonoma County Coast, particularly those which are sensitive to disturbance, and identifies policies, programs, and other initiatives to guide land use and development decision-making in a manner that is consistent with the Coastal Act and community preference.</p>	<p>Recommend substitution of the term "ecological assets." In place of "natural resources". Recommend changing "use of the coastline" to "The coastline as habitat for...". Define what is meant by the term "community preference", as it has policy implications.</p>
	3.1.1 California Coastal Act					
	3.1.2 Biotic Resources of the Coastal Zone	17	17	<p>• The four "main" biotic resource categories do not reflect the critically important distinctions within each of the very broad categories, and these distinctions are necessary to articulate in order to develop policies within those types (eg, grouping forests and the myriad grassland and scrub vegetation types into a single terrestrial habitat group). Are seasonally saturated grasslands "wetlands" or "terrestrial"? • No mention is made of the nature of historical ecosystem management and related influences on existing terrestrial, wetlands, and riparian types—for instance, both the prehistoric ecological practices of indigenous residents along the coast and those of European-Americans following. • The very separation of "biotic resources" into such broad categories represents an inherent bias towards compartmentalizing integrated ecosystems, when all these systems influence and are contiguous and mutually interdependent with the others, as well as those further inland and further seaward. Such bias leads to the promotion of some habitats and species as more important, and consequently more subject to conservation, when all ecosystems play an integral role in regional and global ecological health and functioning.</p>	<p>Please expand this section to include the points mentioned in the comment. Policies can then be modified to reflect modern science.</p>	
	3.1.3 Streams and Riparian Corridors	17	17-18	<p>See the 3 paragraphs describing streams and riparian corridors. There is no mention of upslope impacts on stream hydrology, water quality, and habitat connectivity, including those related to timber extraction and agriculture, including livestock ranching. Also, why are not all streams, beyond those identified as "critical habitat," not included within broader watershed- and region-wide inventories of critical habitat – to include near-shore marine ecosystems – since all that water flows into existing "potential habitat"? Upstream effects and quality matter to all resident species, and likely to those not resident.</p>	<p>Insert as next-to last line in first para on page 17, after ".....fish and wildlife.": "Upslope impacts on stream hydrology, water quality, and habitat connectivity, including those related to timber extraction and agriculture, including livestock ranching will be reflected in Policies."</p>	



3.1.4 Wetlands	18		1st para	<p>"Much of the wetland habitat found along the coast occurs near Bodega Bay." • All wetlands are "important" habitat, not just salt and brackish marshes.</p> <p>• Sea level rise "provides" a challenge – well, it is arguably an ongoing reality and the challenge is to provide for the geographical shifts in ecosystems that will occur, such as by prohibiting development (including roads and bridges) in areas likely to be partially or wholly inundated over the next century, if not beyond.</p> <p>• With sea level rise already in process, any provisions within the revised LCP for development within this zone should be eliminated, including more roads or other facilities for fossil fuel-powered transportation.</p>	<p>Add after this sentence: "While a fair portion of salt and brackish marshes are located in this vicinity (Estero Americano, confluence of Brooks, Mantua, and Cheney Gulches at Doran Beach, San Andreas Rift Zone and Bodega Head, mouth of Salmon Creek), numerous areas along the Sonoma Coast support the hydrology and vegetation of freshwater wetlands (as defined both by USACE and CCA). These include coastal terrace grassland and scrub from Estero Americano north to Russian Gulch, in the vicinity of Fort Ross, then north to the mouth of the Gualala River. As well, most streams that empty directly into the Pacific Ocean support salt or brackish marshes of some dimension, critical habitat to the organisms that rely on those assets."</p>
		19	2nd-to-last line	<p>"Salt and brackish marshes have been greatly reduced from their historical extent and are important habitat to protect and restore, where feasible."</p>	<p>Change to: Salt and brackish marshes <i>and all wetlands have been greatly reduced from their historical extent and will be reduced further with climate change. They are critical habitat to restore and protect.</i>" Drop "where feasible". No qualifier is needed and the phrase is used frequently throughout the document, often to excuse proper mitigation or expenses associated with environmental degradation.</p>
3.1.5 Marine Habitats		19	1st para	<p>"The Sonoma County coast contains a wide variety of marine habitats including offshore rocks, kelp forests, eelgrass beds, tidal flats, rocky intertidal shoreline, and sandy beaches." Offshore rocks with portions above mean high tide, sandy beaches and flat near-shore sea stack summits should be considered terrestrial habitats.</p>	<p>Change ending to: "...tidal flats and rocky intertidal shorelines."</p>
			2nd para	<p>"Offshore of the Sonoma coast, coastal waters provide habitat to a large number of fish and invertebrates (e.g. crab)... While offshore waters provide foraging habitat for seabirds, offshore rocks provide roosting and nesting areas for seabird...."</p>	<p>Consider adding as a fourth sentence: "All offshore rocks, islands, exposed reefs and pinnacles along the California coast are designated components of the California Coastal Monument (DOI/BLM). Kelp forests are commonly found in nearshore coastal waters from south of Bodega Head to north of the Russian River."</p>
		19	2nd para, last line	<p>"Management challenges to marine habitats include overfishing, water quality, human disturbance, and climate change."</p>	<p>Consider changing to: "Challenges for ecologically informed management, protection, conservation, and rehabilitation of marine ecosystems include overfishing (define), water quality degradation, recreational impacts and other deleterious human activities, including the ongoing and eventual implications of climate change."</p>
		20	1st para	<p>"Bodega Harbor and Estero Americano also contain exposed tidal mudflats at low tide which provide an important invertebrate food source for shorebirds."</p>	<p>Add: "These mudflats contribute to Bodega Bay's designation in 2001 as an Important Bird Area (IBA) by the American Bird Conservancy, one of 500 Globally Important Bird Areas."</p>

			20	2nd para	"Rocky intertidal habitat and sandy beaches occur in narrow bands over much of the Sonoma Coast and provide great foraging grounds for shorebirds and gulls. Rocky intertidal shores are exposed during low tide and covered by seawater during high tide. The plants (likely limited to eelgrass), invertebrates, and algae that live in the rocky intertidal zone create a biologically diverse and productive community."	Drop: "(likely limited to eelgrass)". There are plants other than eelgrass in the intertidal zone.
			20	3rd para	"Stellar sea lions and other pinnipeds haul out on offshore intertidal areas that become exposed at low tides. Seals and sea lions use intertidal areas and sandy beaches, spits, and bars to haul out and rest. Harbor seals specifically use sandy beaches including the beaches at Sonoma Coast Sea Ranch, Jenner, and Bodega Bay to rest, molt, give birth, and nurse their pups. California sea lions and northern elephant seals are occasionally observed at these harbor seal haul out locations."	Change to: "Stellar sea lions, protected under both the Endangered Species Act (ESA) and the Marine Mammal Protection Act (MMPA), along with California sea lions and other pinnipeds, also protected by the MMPA, haul out on offshore intertidal areas that become exposed at low tides as well as on offshore rocks..... Harbor seals, in addition to using offshore rocks along the Sonoma coast, specifically use sandy beaches at Sonoma coast locations at Sea Ranch, Sonoma Coast State Park, Goat Rock Beach in Jenner and in the intertidal areas of Bodega Bay to rest, molt, give birth, and nurse their pups."
	3.1.6: Terrestrial Habitats	20		1st para	"A wide range of terrestrial habitats occur throughout the coastal areas of Sonoma County. Terrestrial habitats include coastal dunes, coastal prairie, coastal scrub, woodlands and forests, and urban and residential areas which contain habitats."	Add after "Terrestrial habitats, to name a few, include.....". At end of sentence add: "Near-shore sea stack summits and beaches and rocky outcrops above mean high-tide are included in this category."
		20		2nd para	"Coastal dunes frame many beaches along the coast and support a hardy ground cover of native shrubs, grasses and wildflowers."	Add: "The primary coastal dune ecosystems in Sonoma County are north of Bodega Head (inland the Salmon Creek outlet south to Mussel Point), at Goat Rock adjacent to the Russian River outlet, and at Gualala Point; a small dune system is extant at Wright's Beach. Only the Bodega Head dune system supports native shrubs (primarily mock heather, Chamisso bush lupine, and coyote brush. These dune systems are currently supporting extensive populations of ice plant and European beach grass, as well as annual grasses, and also retain elements of native annual and perennial herbs and graminoids, and a few shrubs."
			21	Continued para from page 20	"...Sonoma County's historic coastal grasslands are now considered non-native annual grasslands after undergoing substantial conversion. For the purpose of legal and regulatory protection of sensitive habitat remnants, as well as microsites supporting extant populations of rare plants, designating "Sonoma County's historic coastal grasslands" as "non-native annual grasslands" is completely misleading and detrimental towards protecting these habitats from further ecological destruction – these areas, within State Parks, on The Wildlands Conservancy properties, in regional parks, and on privately owned ranches and pasture lands, should all be included within the designation of Environmentally Sensitive Habitat Areas."	Change to "...Sonoma County's historic coastal grasslands are now considered reservoirs of habitat remnants as well as microsites supporting extant populations of rare plants."

			21	Last sentence of 1st para	"Coastal prairie and scrub habitat occurs mostly on protected lands including Wright Hill Ranch, Salt Point State Park, Jenner Headlands Preserve, and Sonoma Coast State Park." This sentence is misleading and inaccurate	Change to: "Coastal prairie (historically or currently as coastal non-native annual or perennial grassland) and scrub habitats are extensive on private as well as on public lands within the coastal zone from Estero Americano north to Russian Gulch; historically grasslands and scrub likely occupied even a greater proportion of coastal ecosystems prior to the cessation of indigenous burning and the onset of fire suppression."
			21	Goal C-OSRC-5	"Protect and enhance the native habitats and diverse ecological communities on the Sonoma County Coast."	Add: ".....through inventories, assessment, conservation measures, monitoring, and analysis."
			21	Objective C-OSRC-5.1	"Identify and protect native vegetation and wildlife, particularly occurrences of special status species, wetlands, sensitive native communities, and areas of essential habitat connectivity."	Change to "....protect all native vegetation and wildlife. Specifically map occurrences of special status species, wetlands, sensitive native communities, and areas of essential habitat connectivity, including minimum 200' buffers to include areas for potential species' future movement and expansion."
			21	Objective C-OSRC 5.2	"Designate Environmentally Sensitive Habitat Areas and periodically update designations using credible data sources, including peer-reviewed publications, and recent California Coastal Commission decisions."	Change to ".....Habitat Areas and <i>biannually update designations.....including documentation from citizen scientists, peer-reviewed publications.....</i>
			21	Objective C-OSRC-5.4:	"Where appropriate, support regulatory efforts by other agencies to protect biotic habitats." When would it not be "appropriate"?	Drop the words "where appropriate".
				Objective C-OSRC-5.6	"Balance the need for agricultural production, development, timber and mining operations, and other land uses with the preservation of biotic resources."	Change to: "The conservation of biotic resources shall take precedence over intensification or expansion of agricultural production, development, timber and mining operations and other land uses."
	3.2 Biotic Resources Protection	21	21	Policy C-5a-(1)	Assessments be available to Agencies for timely review by pertinent state and federal resource agency staff, including NMFS, to ensure designated critical habitat for ESA-listed salmonids is protected to the fullest extent practicable.	Require timely review by pertinent state and federal resource agency staff, including NMFS, to ensure designated critical habitat for ESA-listed salmonids is protected to the fullest extent practicable.
			22	Policy C-5a-(7)	"A Restoration and Monitoring Plan shall be required for any project involving habitat mitigation or restoration. The Restoration and Monitoring Plan shall consist of a stand-alone document that specifies performance standards, success criteria, adaptive management, and monitoring requirements as described in Appendix E-1. (GP2020 Revised/New)"" This policy and Appendix E-1 describe an ecological disaster with its mitigation measures equally devastating."	The following Objectives under this Goal will include provision for comprehensive biotic inventories, mapping, and ecologically based assessments conducted by professional scientists, with review by peers as well as by indigenous cultural representatives who retain knowledge and ancestral wisdom for the prudent management of these ecosystems. "Change Policy to state: "Any development damaging habitat (need definition) to the extent of requiring mitigation and/or restoration will be prohibited." Appendix E-1 will be unnecessary."

3.3 Environmentally Sensitive Habitat	22	22-23		<p>"Potential ESHAs are presented on Figures C-OSRC-2a through 2k. These figures are not an exhaustive compilation of the habitat areas that may meet the ESHA definition. Any area not identified as a potential ESHA on C-OSRC-2a through 2k but that meets the ESHA criteria is ESHA, and shall be accorded all the protection provided for ESHAs in the Local Coastal Program." The potential ESHAs mapped in Figures C-OSRC-2a through 2k are grossly underestimated (eg, none in the entirety of Jenner Headlands). Despite the fact that the text promises protections later, the burden of proof would remain in the lap of concerned citizens conducting their own ESHA inventories for each proposed development, presuming the public was even notified, and would involve trespassing on private property. Additionally, there is no verbal or visual reference to wildlife corridors in this section.</p>	<p>Change to: "ESHA mapping, as shown in Figures C-OSRC-2a through 2k, is incomplete. Until it has been updated to reflect modern science, no development shall take place in the coastal zone."</p>
		23	Create 2nd para prior to policies	<p>Unless demonstration to the contrary can be produced, all intact, functional ecosystems, native vegetation, wetlands, and wildlife habitats should be considered for designation as ESHAs – functional ecology within any habitat type shall not be at the discretion of any individual, development interest, or regulatory agency, but resolved through comprehensive description and functional analyses conducted by specialists and cultural practitioners in biology, ecology, ecological restoration, land management, soil science, hydrology, and other pertinent disciplines." Such broader, more inclusive language would be appended to the list of areas (Policy C-OSRC-5b(1) and to the criteria (Policy C-OSRC-5b(2), with the specific areas and criteria listed below this broader provision in order to provide examples of each.)</p>	<p>Also, please insert: "A list of all sensitive species and habitats within the Sonoma County coastal zone shall be maintained by PRMD, and available to interested citizens; these lists shall be revised at no longer than 1-year intervals, and shall include all pertinent criteria applicable for each biotic entity (e.g., some organisms are listed under multiple regulatory statutes) or qualify otherwise for consideration under multiple ESHA criteria. The concept of ESHA shall be amended or appended, with pertinent criteria identifying the methods or criteria applied in support of such designation (e.g, rare plants, snowy plover nesting sites, rare vegetation types, salmonid habitat, public access properties, etc)."</p>
		23	Policy C-OSRC-5b(1):	<p>"2) Areas that contribute to the viability of plant or animal species designated as rare, threatened, or endangered under State or Federal law. "</p>	<p>Add: "...law, including potential wildlife corridors, watercourses, nesting, prey habitat and mating areas."</p>

			23		"4) Areas that contribute to the viability of plant and animal species for which there is compelling evidence of rarity. (New)"	Add: "...compelling evidence of <i>current or impending</i> rarity." And "The concept of ESHA shall be amended or appended, with pertinent criteria identifying the methods or criteria applied in support of such designation (e.g. rare plants, snowy plover nesting sites, rare vegetation types, salmonid habitat, public access properties) to include the following areas: o Estero Americano o Estero (Bottarini) Ranch o Short-tail and Pinnacle Gulches o All other Sonoma County Regional Parks lands within the coastal zone from Estero Americano to Gualala River o Cheney Gulch and slopes o All Doran Beach and Bodega Bay area wetlands, marshes, open water on public or private land o Carrington Ranch o Wright Hill (Poff) Ranch o Private parcels with jurisdictional wetlands, riparian corridors, or special status species o Sonoma Coast State Beach and all other California State Parks lands within the coastal zone from Estero Americano to Gualala River o Salmon Creek riparian corridor and adjacent slopes and Salmon Creek estuary o Russian River riparian zones, estuarine habitats, marshes, and adjacent slopes (including coastal zone tributaries such as Willow Creek) o Jenner Headlands o Russian Gulch and adjacent slopes o All coastal zone slopes downslope or upslope from CA Hwy. 1 between Russian Gulch and Fort Ross State Park o All properties and conservation easements within the coastal zone under current ownership or management of the Sonoma County Agricultural and Open Space District, the Wildlands Conservancy, Sonoma Land Trust, Redwood Coast Land Conservancy, the Sea Ranch Association."
			23	Policy C-OSRC-5b(1):	Add (5):	For the role they play - which includes protecting people and the other species from major decline, and because these species and features can easily be degraded, all trees, grasslands, creeks, and woodland areas are by definition sensitive and their habitats at risk.
			23	Policy C-OSRC-5b(2) (1)		Delete this Policy content, as Figures C-OSRC-2a through 2k are completely inadequate, as stated re: pp 22-23 above.
			23	Policy C-OSRC-5b(2) (5)	"California Native Plant Society "1B" and "2" Listed Species"	Add "... as well, for numerous rank 4 species growing in grassland and scrub ecosystems of the Sonoma Coast."
			23	Policy C-OSRC-5b(2) (10)	"Habitats that Support Listed Species (i.e., those in 2 & 3)"	Change to: "Habitats, <i>wildlife corridors and areas that contribute to the viability of Listed Species or those of impending rarity.</i> "
			23		"(11) Tree stands that support raptor nesting or monarch populations"	Change to: "Tree stands that support raptor <i>and prey perching or nesting and their food sources</i> , or monarch populations"

			24	Policy C-OSRC-5b(3)	<p>"A biological resource assessment shall be required for any project which could impact biological resources. The biological resource assessment shall be performed by a qualified biologist and shall meet criteria described in Appendix E-2, Biological Resource Assessment Requirements. Permit Sonoma may require additional site specific information. (New)" Must include cumulative impact assessment, and require an EIR rather than a biologist's review when discovery isn't adequate for site circumstances</p>	<p>Change 1st sentence to: "A biological assessment and complete inventory shall be required for any project that could impact partially or constituted and functional ecosystems, including an EIR rather than a biologist's review when discovery is not adequate for site circumstances." A list of all sensitive species and habitats within the Sonoma County coastal zone shall be maintained by PRMD, and available to interested citizens; these lists shall be revised at no longer than 1-year intervals, and shall include all pertinent criteria applicable for each biotic entity (e.g., some organisms are listed under multiple regulatory statutes) or qualify otherwise for consideration under multiple ESHA criteria. A revised and complete map of all Sonoma Coast ESHAs shall be developed and maintained by PRMD. The concept of ESHA shall be amended or appended, with pertinent criteria identifying the methods or criteria applied in support of such designation (e.g. rare plants, snowy plover nesting sites, rare vegetation types, salmonid habitat, public access properties) to include the following areas:</p> <ul style="list-style-type: none"> <li>o Estero Americano</li> <li>o Estero (Bottarini) Ranch</li> <li>o Short-tail and Pinnacle Gulches</li> <li>o All other Sonoma County Regional Parks lands within the coastal zone from Estero Americano to Gualala River</li> <li>o Cheney Gulch and slopes</li> <li>o All Doran Beach and Bodega Bay area wetlands, marshes, open water on public or private land</li> <li>o Carrington Ranch</li> <li>o Wright Hill (Poff) Ranch</li> <li>o Private parcels with jurisdictional wetlands, riparian corridors, or special status species</li> <li>o Sonoma Coast State Beach and all other California State Parks lands within the coastal zone from Estero Americano to Gualala River</li> <li>o Salmon Creek riparian corridor and adjacent slopes and Salmon Creek estuary</li> <li>o Russian River riparian zones, estuarine habitats, marshes, and adjacent slopes (including coastal zone tributaries such as Willow Creek)</li> <li>o Jenner Headlands</li> <li>o Russian Gulch and adjacent slopes</li> <li>o All coastal zone slopes downslope or upslope from CA Hwy. 1 between Russian Gulch and Fort Ross State Park</li> <li>o All properties and conservation easements within the coastal zone under current ownership or management of the Sonoma County Agricultural and Open Space District, the Wildlands Conservancy, Sonoma Land Trust, Redwood Coast Land Conservancy, the Sea Ranch Association.</li> </ul>
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			24	Policy C-OSRC-5b (4)	unacceptably allows new development within 100' of an ESHA. There is no mention of wildlife effects or migratory corridor preservation. There is no mention of domestic animal (ie, dog and cat) effects on ESHAs.	Require 100' setback of and ESHA
			24	Policy C-OSRC-5b(5)	unacceptably allows new development within 100' of an ESHA. There is no mention of wildlife effects or migratory corridor preservation. There is no mention of domestic animal (ie, dog and cat) effects on ESHAs.	
			24	Policy C-OSRC-5b(7)	ESHA includes "areas that contribute to the viability of plant or animal species designated as rare, threatened, or endangered under State or Federal law"....	State and federal resource agency staff shall review any biological assessments used to justify smaller buffer distances surrounding Environmentally Sensitive Habitat Areas (ESHA).
			24	Policy C-OSRC-5b (8)	fundamentally unsound, granting development with least impact on ESHAs, and citing mitigation as the rationale. It should be struck from the Draft.	This policy should be struck from the Draft.
			25	Policy C-OSRC-5b (10)	allows property owners of undefined longevity to violate ESHAs if they cannot be "justly compensated" (not defined) for any missed economic opportunities that result. This policy should be struck from the Draft	This policy should be struck from the Draft.
ç			25	Policy C-OSRC-5b (11)	allows for subdivisions within undefined ESHA proximity. It allows development as long as infrastructure for new construction does not impact ESHA buffers or watercourses. This policy should be struck from the Draft.	This policy should be struck from the Draft.
	3.4 Streams and Riparian Vegetation	25	26	Policy C-OSRC-5c(2)	Allowable uses and development within any streamside conservation area or Riparian Corridor shall be limited to uses and methods described in Habitat Development Guidelines where it can be sited, designed, and shown that construction, operation, and maintenance of the use or development would not result in significant, long-term adverse impacts on the functions and values of the riparian habitat. (Existing LCP Revised: Recommendations 9-13 on pages 28-29)	Include the Habitat Development Guidelines or a link to them here.
			26	Policy C-OSRC-5c (3)	NMFS recently completed a programmatic biological opinion in consultation with the U.S. Corps of Engineers (SF District) that encourages the use of bio-engineered bank stabilization when protecting critical infrastructure threatened by streambank erosion. Designing and implementing bio-engineered projects in accordance with the programmatic biological opinion will significantly streamline federal project permitting. Allows water supply projects and mitigation for "unavoidable impacts" on ESHAs. Such potential "necessary water supply projects as concrete walls and rip-rapping of stream banks will be "discouraged". This policy would allow for such discretionary and inappropriate projects as vineyard ponds, and should be struck from the Draft.	Strike "discourage" from the Draft. Design and implement bio-engineered projects in accordance with the programmatic biological opinion to significantly streamline federal project permitting.
			27	Policy C-OSRC-5c(6)	The policy refers to "Anadromous Fish Streams", but qualifies that terms as "Chinook and Coho Salmon Habitat". Steelhead are a federally-listed anadromous species, and as such should be included in the above qualifier.	Include steelhead as a federally-listed anadromous species.

			27	Policy C-OSRC-5c(8)	Per NOAA: "We request that NMFS be included as an agency "responsible for natural resource protection", and thus be afforded the opportunity, like the California Department of Fish and Wildlife, to review and provide comment on permit applications near streams or waterways."	"and the NMFS" should be inserted after "Fish and Wildlife" in the Policy.
	3.5 Wetlands	27		1st para	"Wetlands are here defined to include marshes, ponds, seeps, and reservoirs."	Insert: "...marshes, ponds, seeps, reservoirs, <i>pond edges, seasonally inundated grasslands and scrub wetlands</i> ), as well as the <i>contiguous upslope portions of riparian habitats</i> ."
			28	Policy C-OSRC 5d (3)	allows Permit Sonoma to determine whether development would affect a wetland or not. Scientific assessments conducted by disinterested, objective experts in their fields should determine suitability for any construction in the Coastal Zone.	Change to: "Objective experts in their fields shall determine suitability for any construction in the Coastal Zone wetlands, rather than Permit Sonoma."
			28	Policy C-OSRC-5d (5)	does not specify best practices for dredging, etc, available in the Marine Sanctuary guidelines. <i>It should refer and defer to that document</i>	
			27 -28	Policy C-OSRC-5d (6) & (7)	allow for new construction with mitigations within 100' of wetlands. These are not science-based policies, do not anticipate future industry such as aqua-farming, and should be struck from the draft until they are reviewed by objective expert opinion.	Strike from the draft until they are reviewed by objective expert opinion.
	3.6 Marine Habitats	29			Unless demonstration to the contrary can be produced, all intact, functional ecosystems, native vegetation, wetlands, and wildlife habitats should be considered for designation as ESHAs – functional ecology within any habitat type shall not be at the discretion of any individual, development interest, or regulatory agency, but resolved through comprehensive description and functional analyses conducted by specialists and cultural practitioners in biology, ecology, ecological restoration, land management, soil science, hydrology, and other pertinent disciplines; such broader, more inclusive language would be appended to the list of areas	
			30	Policy C-OSRC-5e (3) & (5)	Both of these policies are intended to protect biological resources (nesting birds on offshore rocks; disturbance of marine mammal haul outs). But there is no mechanism specified for enforcement of the prohibitions against trespass on or disturbance of these sensitive habitats. We agree with The Sea Ranch in suggesting a new policy	Policy C-OSRC 5e (5a): "Encourage the joint development of a plan by County Parks, USFWS, BLM and Save the Sonoma Coast for protection of these biological resources (nesting birds on offshore rocks; marine mammal haul outs) through enforceable public access limitations."



			30	Policy C-OSRC-5e (4) (3)	"Opening of sand bars, except where necessary for maintenance of tidal flow to ensure the continued biological productivity of streams and associated wetlands and to prevent flooding. Applications for allowable opening shall include a plan, prepared in consultation with and reviewed by applicable resource agencies (e.g., National Marine Fisheries Service and California Department of Fish and Wildlife) that describes measures that will be implemented to avoid and/or minimize impacts on special status species affected by the proposed action. Sand bars shall not be breached until there is sufficient in-stream flow to preserve anadromous fish runs. (Existing LCP Revised)." The volunteer SealWatch program that has been operated by Stewards of the Coast and Redwoods since 1985 is hard-pressed to protect the Harbor Seal haulout and rookery at the mouth of the Russian River under the pressure of increased visitor populations, an aging resident (volunteer) population, rising ocean levels, and changing weather patterns. Measures must be taken to strengthen or augment the program with greater support from state and county agencies. The word "avoided" in this policy is not strong enough.	Change to: "...implemented to <i>prevent</i> impacts on special status species...."
			30	Policy C-OSRC-5e(6)	Encourage the California Department of Fish and Wildlife to monitor Marine Mammal Haul-Out Grounds on an annual basis to determine their condition and level of use by marine mammals; and to incorporate this information into its management plan for marine mammals. (Existing LCP Revised)." "Encourage" is very weak language here and ANNUAL not sufficient. Stewards currently monitors on a bi-weekly basis and monitoring should occur on a weekly basis during March-June pupping season and the August-September molting season.	Change to: " <i>Collaborate with the California Department of Fish and Wildlife to monitor Marine Mammal Haul-Out Grounds on a bi-weekly basis and on a weekly basis during pupping season (March through June) and molting season (August through September)</i> , in order to determine their condition and level of use and to incorporate this information into its management plan for marine mammals."
			30	Policy C-OSRC-5e (7)	3) Prohibit petroleum and other forms of energy development which may have a significant impact on kelp beds as a result of normal operations or accidents (e.g., oil spills and well blowouts); and	Change to: Prohibit petroleum drilling and other forms of energy development, <i>such as offshore wind turbines, which may have...."</i>
	3.7 Terrestrial Habitats	31		Policy C-OSRC-5f (1) (1)	"Uses other than resource-dependent, scientific, educational, and passive recreational uses including support facilities." The exemption of undefined "support facilities" is improper.	Please define the words "support facilities" with specific examples or drop the words entirely.
		31		Policy C-OSRC-5f (1) (5)	5) "Removal of sand except where required for construction of parks and support facilities. (Existing LCP Revised)"	Drop this policy, as it would be ecologically inadvisable to build parks and support facilities that require sand removal.
		31		Policy C-OSRC-5f (2)	On dunes/coastal strand, carry-out the following activities to preserve native vegetation: (1) Limit public access in areas of plant communities. (2) Post signs which explain the importance of limiting public access to protect plant communities.	Change to: "On dunes/coastal strand <i>and other sensitive areas frequented by people</i> , carry out the following..." (2) Post signs...limiting public access, <i>including dogs</i> , to protect plant <i>and wildlife</i> communities."

		32		Policy C-OSRC-5f (6)	"The identification through site assessment, preservation, and protection of native trees and woodlands shall be required. To the maximum extent practicable, the removal of native trees and fragmentation of woodlands shall be minimized; any trees removed shall be replaced, preferably on the site at a greater than 1:1 ratio (and at a greater than 3:1 ratio for riparian trees); and permanent protection of other existing woodlands shall be provided where replacement planting does not provide adequate mitigation. (GP2020 Revised". For reasons of habitat preservation, carbon sequestration, scenic qualities, etc, the language in this policy is in conflict with the stated values in the Element and should be amended.	Change to: "The removal of native trees and fragmentation of woodlands shall be <i>prohibited without a publicized public hearing. Any trees removed with public consent shall be replaced....and permanent protection of other existing woodlands shall be provided in addition to replacement planting.</i> "
		33		Policy C-OSRC-5f (10)	"At, around, and near osprey nest sites, the following shall be prohibited: (1) Removal of osprey nests. (2) Removal of snags and dead tops of live trees. (3) Development of new structures and roads. Recreational activities shall be limited to low-intensity passive recreation, these areas are particularly vulnerable during the period of egg incubation in May to July and activities should be further limited. Osprey nest sites located adjacent to Willow Creek, Freezeout Creek, and Russian River shall be protected from disturbance by timber harvesting activities. (Existing LCP Revised)" We now have bald eagles and a threatened white-tailed kite population in similar habitat areas as those of osprey.	Change to: "...near osprey, eagle and kite nests and any other threatened or endangered birds' nests, the following ....." Remove the word "Osprey" and simply state: "Nest sites located adjacent.....".
		33		Policy C-OSRC-5f (11)	Construction during nesting season will cause birds to abandon their nests and offspring and should be banned.	
		34		Policy C-OSRC-5f (13)	"On coastal bluffs, public access in areas used by birds for nesting or resting, and removal of native plant species shall be minimized. (Existing LCP Revised)"	Change to: "...shall be <i>prohibited</i> " (rather than minimized).
4. Commercial Fishing & Support Facilities Policy	4.1 Background	34	4.1.2 Climate Change		The following discussion of the potential impacts of climate change on fisheries is based on information on the U.S. Environmental Protection Agency's 2013 Website:"	Please update this section to a modern citation of the EPA's website.
		36	4.1.4 Oil exploration and development		"Oil exploration and development on the Sonoma County coast may adversely affect sensitive areas identified in the Local Coastal Plan. Streams and estuaries serve as nursery areas and habitats for commercial fish species and are especially vulnerable to damage by an oil spill. Offshore activities such as oil platforms, pipelines, and tankers could interfere with commercial fishing activities. Ocean disposal of wastewater could adversely affect nursery areas and the commercial fishing industry. See the Outer Continental Shelf Development Policy section of the Land Use Element for information and policy on oil exploration and development on the Sonoma County coast." Now that wind turbines are becoming the hope of the future and carry many adverse effects to their marine environment, this section should be written to address them, as well.	Change to "Oil <i>and wind</i> exploration and development... may adversely affect <i>both terrestrial and marine habitats.....</i> commercial fishing industry." Add: "Though <i>comparatively benign compared to fossil fuel energy sources, floating offshore wind turbines come with potential to harm avian and marine life through mechanical trauma, unintended electrical discharges, spills of hydraulic fluids or from maintenance craft. Their effects on fish and their on-shore infrastructure will lead to changes in the fishing industry and the same type of environmental impacts seen with offshore oil rigs.</i> "

				6.1.3	Insert after "Sustainable logging practices and forest management should result in a forest resource which regenerates itself and allows for perpetuating related forest and watershed values. <i>Forested watersheds provide more than just timber – they provide important groundwater recharge, carbon sequestration, biodiversity and other contributions to the commons. Keeping forest lands ...</i> "
	4.1.7 Bodega Harbor Maintenance Dredging	42-43		Objective C-OSRC-6.2	<p>"Conduct dredging in a manner that minimizes impacts on the ocean, marine, and estuarine environments." In addition to this brief objective, it is important to regulate and monitor activities such as sewage disposal, dredging, and renewable energy development, and other projects which could degrade nearshore marine water quality and hence have an adverse impact on kelp habitat; No mention is made here of a recent collaboration between Sonoma County and the Marine Sanctuary, which specifies best practices for dredging operations.</p> <p>Reference and adhere to the Marine Sanctuaries nest dredging practices document. Reference, update policies for consideration of beneficial reuse of dredge materials, and adhere to the Greater Farallones National Marine Sanctuaries Coastal Resilience Plan for Bodega Harbor <a href="https://nmsfarallones.blob.core.windows.net/farallones-prod/media/docs/20191101-coastal-resilience-and-sediment-plan.pdf">https://nmsfarallones.blob.core.windows.net/farallones-prod/media/docs/20191101-coastal-resilience-and-sediment-plan.pdf</a> Remove all references to "Dredge Spoils" as proper term is Dredged Materials</p>
5. Soil Resources Policy		45			<p>There is no statement of guiding principles with regard to goals, objectives and policies recommended in Chapters 5-10.</p> <p>Chapters 5 through 10: Resources Policies • All government, private, or commercial activities existing or proposed that may have deleterious impacts on ecologically intact and functional areas, including individual species or habitats, native vegetation stands, water bodies, riparian zones, beaches, offshore rocks, estuaries, etc. shall be subject to a period of public review prior to continuation or initiation of permit approval by PRMD, the California Coastal Commission, and the Sonoma County Board of Supervisors – ultimate permit approval for the coastal zone must reside in the local agency and local Board, with a provision for appeal to the Coastal Commission if project proposals have not adequately disclosed potential impacts on ecological elements.</p>

	Agricultural and Timber Soils	46		Policy C-OSRC-7a	By using GP 2020, again, to apply the agricultural land use category to "areas of productive agricultural soils" means generally re-zoning so that any agricultural use, including wine grapes, could be grown in the coastal zone.	<p>Include in this policy a ban on pesticides (including anticoagulant rodenticides and synthetics), vineyards (and cannabis cultivation, which will be increasingly pushed) altogether in the coastal zone, as has been successfully litigated in the Santa Monica Coastal Zone. The following case and action by the CCC is backup reasoning for the Sonoma County LCP banning pesticides. "A California Court of Appeal upheld denial of a petition by vintners challenging the prohibition on new vineyards within the Santa Monica Mountains Coastal Zone in deference to the California Coastal Commission's finding that viticulture adversely impacts sensitive habitats, water quality, water supply, and scenic resources. Mountainlands Conservancy, LLC v. California Coastal Commission, No. B287079 (2d Dist., Apr. 1, 2020). The California Coastal Act requires the California Coastal Commission to review and certify local coastal programs (LCP) developed by local authorities that control land use planning within their respective areas of the coastal zone. Los Angeles County proposed to amend the LCP for the Santa Monica Mountains Coastal Zone in a manner that would ban new agricultural uses. Commission staff recommended approval of the LCP with modifications that lightened restrictions on some new agriculture but retained the ban on new vineyards. Commission staff reasoned that the majority of land within the LCP area was "unsuitable" for agriculture, and new vineyards should "remain prohibited due to a number of identified adverse impacts attributed specifically to those operations, including increased erosion from removal of all vegetation, use of pesticides, large amounts of water required, their invasive nature, and their adverse impact to scenic views." The Commission unanimously voted to approve the LCP as modified and certified the LCP in October 2014. (Landowners within the LCP area sued, contending principally that the Commission erred in failing to heed policies favoring the preservation of agricultural lands within the coastal zone and that there was insufficient evidence to justify its ban on new vineyards.)</p>
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	5.2 Soil Erosion	46		2nd paragraph	"Hillside cultivation and overgrazing are a particular concern in agricultural areas. Measures are needed to reduce erosion. However, erosion protection measures may not always be cost effective for the landowner." The second sentence implies that landowners will be exempted from erosion control policy. Per NOAA letter: "The last sentence appears to be a non-sequitur, and does not contribute to a section that is attempting to promote and encourage soil conservation and management practices.	When soil erosion is a potential threat such that appropriate protection measures are not "cost-effective" to a landowner, then the project in question should be denied a permit until such measures can be implemented."
		46		Objective C-OSRC 8.1	Consider including from 2008 LCP: Recommend to the Agricultural Stabilization and Conservation Services, United States Department of Agriculture, that fencing of riparian vegetation for stream protection be a priority coastal practice where needed for bank stabilization in the Agricultural Conservation Program. Another priority coastal practice which should be funded is the fencing of the steep slopes along the high cliffs north of Russian Gulch and south of Fort Ross to prevent overgrazing. Promote use of sensitive soils as watershed and wildlife habitat."	Change to: "Ensure that permitted uses do not cause soil erosion."
		46		Objective C-OSRC-8.2	"Establish ways to prevent soil erosion and restore areas damaged by erosion." This is woefully incomplete, out of date and non-specific. Surely modern scientific references for best erosion prevention and restoration can be cited.	Replace this Objective with "Best practices for prevention of erosion and restoration of eroded lands shall be followed (give reference).
	Soil Resources Policy	46				
		46-47		PolicyC-OSRC-8a, (1) through (5) and Policy C-8b	None of these policies, again inappropriately adopted from GP 2020 should be accepted in the coastal zone, with its crumbling Franciscan Formation soils and current alarming patterns of erosion.	Change to 8a (1): "...slopes of 5% or greater." (2): "Erosion control measures shall be incorporated as part of all projects." (3): " No projects which could increase erosion or waterways shall be permitted. (4): "Any new roads or driveways .....topography". Drop "as feasible". (5): "Any improvements .....topography." Drop "to the extent feasible". Policy 8b refers to enforcement of a building code which is not applicable to the coastal zone. Change to: Enforcement of special building code requirements for the coastal zone shall be strictly observed." We must collaborate to define a special code.
6. Timber Resources Policy		47	48	6.1.2	Policy C-OSRC-8a, (1) through (5) and Policy C-8b	At the very least, timberland conversions must be reviewed by the County as a "project allowed by the Forest Practice Rules". Forest Practice Rules and CEQA still allow for counties to engage in sign-off for any conversion projects. There shall be prohibition against any conversion of oak woodlands and class 1, 2, and 3 timber conversions to vineyard. The County shall review any THPs on private lands for adherence to best forest management practices. From 2008: "Promote a high level of agricultural and forestry management practices which protect environmental values to help insure the long term use and conservation of coastal resources." Should be included in Ag & Timber sections

				6.1.3	on sustainable logging practices constitutes a great argument for a County Forester. The County will need to respond to predictable protests by groups like Forests Unlimited and Friends of the Gualala River.	
			50	Goal C-OSRC-9		Define conservation - or add "environmental/watershed values:" clean air, carbon sequestration, clean water, groundwater recharge, wildlife habitat, plant and wildlife habitat diversity.
			50	Objective C-OSRC-9.1	Does "values" mean only lands zoned TP?	Change the word "reduce" to "eliminate".
			50	Objective C-OSCR 9.2	There is no acknowledgement of forests' critical role in carbon sequestration and climate change buffering. Add Objective C-OSRC 9.2	Define "conservation". Insert: "resources for their role in carbon sequestration and climate change reduction, and for their role in economic .....". And ADD GOAL C-OSRC-9: Preserve, sustain, and restore forestry resources for their economic, conservation, environmental and watershed values recreation, and open space values – specifically values that provide clean air, carbon sequestration, clean water, groundwater recharge, wildlife habitat, plant and wildlife habitat diversity. THP in the coastal zone. New Objective OSRC Add: No warehouses, large structures or structures that will potentially overwhelm the first responder fire company will be allowed in the RRD and timber zones.
				C-OSRC-9.2		" economic .....". Objective C-OSRC-9.2: Minimize the potential adverse impacts of timber harvesting on economic, conservation, environmental and watershed values, recreation, and open space values – specifically values that provide clean air, carbon sequestration, clean water, groundwater recharge, wildlife habitat, plant and wildlife habitat diversity recreation, and; and restore harvested areas to production for a future yield
			50	Insert Objective C-OSRC-9.3:	Review new science on optimal forest management for habitat, carbon sequestration and fire prevention. Guidelines can be found in Santa Cruz County's forestry management plan and in the March, 2020 Fremontia article on "Ecological Forestry" by Rodd Kelsey, lead scientist at The Nature Conservancy's California Chapter.	
			50 - 51	Policy C-OSRC-9a	Policy C-OSRC-9a can be interpreted to emphasize the need for a county forester to be in on the pre-harvest inspection.	Insert as last sentence: However, the Coastal Commission shall be specifically invited to participate and comment on each THP in the coastal zone.
		51		Policy C-OSRC-9b	timberland zones adjacent parcels are recommended for timberland use categorization.	Please clarify the intent. Include all the timber-bearing land in the timberland use category, as they all have timber soil.
			50 -51		Sonoma County should take responsibility for forest management—not CalFire, which has proven its willingness to cut Gualala Headwaters' redwoods. Local control equals local accountability. Clear-cutting is in conflict with climate change policy.	

				Policy C-OSRC-9e	This needs some clarification in this seemingly contradictory section: clearcutting here would mean removal of all commercial conifer species. If non-commercial species comprise 50% or more of the overstory, it may be possible to retain 50% of the overstory canopy	Change "request that clear cutting not occur within streamside ..." to "require that clear cutting not occur within streamside ...."
7. Mineral Resources Policy		51	51	First para, last sentence	What does "released and reclaimed" mean?	
			51	2nd para	No mention of adverse effects on viewscape along Hwy 1 should Cheney Gulch Quarry become active. Note that Peter Douglas, Coastal Commission ED, wrote a letter to Bill Dutra, advising him that any expansion of the Cheney Gulch quarry would be in major conflict with coastal resource protection policies (letter copy w Norma Jellison).	Insert "...loss of viewscape and agricultural land."
			52	Second para, last sentence and Policy C-OSRC-10a	"Sonoma County has considered the importance of its aggregate resources to the regional market and not just to the County." This sentence implies 2 things—that Cheney Gulch will be reopened to quarry operations and that it will source not only local coastal projects but also provide aggregate to the rest of the North Bay. With respect to hard rock mining proposals in the Coastal Zone, the Cheney Gulch Mineral Resources (MR) interest area should not be allowed to be opened to mining, given the known propensity of the area for both gully and sheet erosion and geologic instability. The associated transportation mechanisms for any produced rock, and the high visibility of any resultant mining scars from Coast Highway One (Policy C-OSRC-10a), are additional considerations that argue against quarry development at this site. A large cross-country automated conveyor apparatus, proposed for the Cheney Gulch region in recent mining plans and leading to a crushed rock loading facility for transit by barges out of Bodega Bay also poses the threat of harmful maritime slurry spills and vessel collisions in our busy harbor.	
			52	GOAL C-OSRC-10	Provide for production of aggregates to meet local needs and contribute the County's share of demand in the North Bay production-consumption region. Manage aggregate resources to avoid needless resource depletion and ensure that extraction results in the fewest environmental impacts.	Change to "...meet local needs only. Manage aggregate resources to minimize greenhouse gas emissions, viewscape impacts, and all environmental impacts.
		52		Objective C-OSRC-10.1:	Use the Aggregate Resources Management Plan to establish priority areas for aggregate production and to establish detailed policies, procedures, and standards for mineral extraction.	Change to: Use the Aggregate Resources Management Plan to establish priority areas to meet local needs only. Manage aggregate resources to minimize greenhouse gas emissions, viewscape impacts, and all environmental impacts.
		52		Objective C-OSRC-10.2	"Minimize and mitigate the adverse environmental effects of mineral extraction and reclaim mined lands."	Drop "reclaim mined lands". Change to "reclaim only those mined lands necessary to source local coastal projects. Select only sites without viewscape impacts or adverse erosive, geologic instability or sensitive biotic resource impacts.

		52		Policy C-OSRC-10a	"Consider areas zoned Mineral Resources (MR) or areas designated by the State Mining and Geology Board as regionally significant for construction grade aggregate as priority sites for aggregate production and mineral extraction. Within the Coastal Zone, these areas presently include sandstone deposits located in Cheney Gulch, approximately 2.5 miles east of Bodega Bay in western Sonoma County.2 Review requests for additional designations for conformity with the Local Coastal Plan and the Aggregate Resources Management (ARM) Plan. (GP2020)"	Again, GP 2020 language is completely unfitting for use in the coastal zone. Drop the second sentence. Change last sentence to: "Review requests for designations meeting criteria for Objective C-OSRC-10.2 (as re-written above) and for conformity.....(ARM) Plan." Include Mining Resources Map
		52		Policy C-OSRC-10b	Consider areas zoned Mineral Resources (MR) or areas designated by the State Mining and Geology Board as regionally significant for construction grade aggregate as priority sites for aggregate production and mineral extraction. Within the Coastal Zone, these areas presently include sandstone deposits located in Cheney Gulch, approximately 2.5 miles east of Bodega Bay in western Sonoma County.2 Review requests for additional designations for conformity with the Local Coastal Plan and the Aggregate Resources Management (ARM) Plan. (GP2020)	Drop the last phrase and reference to GP2020: "and the need for economical aggregate materials. (GP2020). The need for aggregate materials should not supersede the conservation of the coastal zone.
		53		Policy C-OSRC-10c	"Review projects that are on or near sites designated Mineral Resources in the Aggregate Resources Management Plan for compatibility with future mineral extraction. (GP2020)"	Change to "...future mineral extraction only if the site has no adverse viewscape, erosive, geologic or sensitive biotic impacts."
8. Energy Resources Policy	8.1 Background	53			In general, this information is not specific to the coastal zone. It also lacks any modern scientific references. The background section does not discuss the unique situation coastal communities regarding their dependency on imported sources of energy, including liquid fuels and electricity, and their vulnerability to energy disruptions due to hazards such as geological events and damages to transportation lifelines. This dependency underscores the importance of supporting enhanced independent energy initiatives in coastal areas.	Enter Sonoma County coastal zone-specific, science-based climate change predictions. Ie, a warmer inland climate will potentially result in more fog rather than more use of air conditioning.
	8.2 Energy Conservation & Demand Reduction	55	56	Policy C-OSRC-11d	"Manage timberlands for their value both in timber production and offsetting greenhouse gas emissions." (GP2020)	Change to "Manage timberlands to maximize climate change mitigation, habitat value, biodiversity and scientific fire fuel reduction practices, as well as for their economic value."
			57	Policies C-OSRC 12a and c:	Reference is made to ESHA	Considering that ESHA criteria are rapidly expanding as a result of climate change and that the ESHA maps provided in this draft are inadequate, these policies must be revised after ESHA mapping is revised.
	8.3 Energy Production & Supply	56			The Draft text recommends development of alternative sources of energy, such as geothermal, wind and solar, based on GP 2020 text, which is again inappropriately applied to the coastal zone.	



			56 - 57		<p>section does not discuss the current status of renewable and distributed generation applications on the coast. These data are available, but not cited or discussed. There is no mention of the county's community choice agency, Sonoma Clean Power, and its impact on the shift to renewable vs fossil fuel energy supply sources. Policy recommendations encourage the development of renewables in a generic way, but there is no mention of the potential future importance of microgrids, County solar incentive programs such as PACE, etc. Suggest adding the following new policies:</p>	<p>Policy C-OSCR 12d: Encourage the development of microgrids and storage capacity to enhance the energy independence and energy security of coastal communities."</p> <p>Policy C-OSCR 12e: Encourage and promote County and Sonoma Clean Power programs that provide incentives for the development and use of renewable energy in the residential and commercial sectors. "</p>
9. Air Resources Policy			57 - 59		<p>As a multi-year policy document, the LCP should go beyond the statement that the Northern Air District is in attainment. While it is acknowledged that vehicular traffic is the largest source of GHG and air pollutants, no data are presented on the sources and volumes of traffic associated with the import of fuels, food and durable goods and tourism-related visitors to the coast. A primary strategy to reduce GHG and other emissions in this section, and in the Circulation and Traffic Element (Objective C-CT-1.3) is to minimize increases in future vehicle traffic (but from what to what?). The LCP should address ways in which vehicle emissions from internal combustion engines can be reduced.</p>	<p>Suggest adding: Policy C-OSRC 13a-Support and promote the installation of a network of electric charging stations along the coast to encourage the use of EVs by both local residents and coastal visitors.</p>
		57		2nd para, last sentence	<p>"Residential wood stoves are a contributor to particulate levels in urban areas in Northern Sonoma County."</p>	<p>Clarify intention ... should be "rural" rather than "urban" areas?.</p>
		58		3rd para, 1st sentence	<p>Please define "nonattainment area"</p>	
		58		Policy C-OSRC-13b	<p>"Proposed changes in land use shall be denied unless they are consistent with projected air quality levels. (GP2020)"</p>	<p>This policy implies that land use changes are allowed in the coastal zone, again citing the inappropriate GP2020. Proposed changes in land use are prohibited according to the Land Use Element. Drop this Policy.</p>
		59		Policy C-OSRC-13c	<p>"Any proposed new source of toxic air contaminants or odors shall provide adequate buffers to protect sensitive receptors and comply with applicable health standards. Buffering techniques such as landscaping, setbacks, and screening in areas where such land uses abut one another shall be used to promote land use compatibility. (GP2020)"</p>	<p>Change to: "No new sources of toxic air contaminants or foul odors shall be permitted."</p>
10. Archeological & Historic Resources Policy	10.1 Background	59				

11. Implementation Programs						<ul style="list-style-type: none"> <li>• Add a provision for a program to initiate ecological monitoring of all recreational or other public uses of undeveloped (open space) areas, to include assessments of human carrying capacity, deleterious impacts associated with human activities (e.g., erosion, soil compaction, loss of or damage to vegetation or wildlife habitat, noise or light pollution) etc.</li> <li>• A provision for ecological monitoring and a schedule of assessment and response to ongoing data accrual shall also be required for all extractive agricultural activities, specifically including crop production, wine grape production, grazing and livestock rearing and development, timber extraction, road construction, prescription fire (as much as this must be incorporated into regional vegetation management policy), or any other activity – past, current, future – with the potential to render impacts to ecosystem constitution or function.</li> </ul>
	11.1 Open Space & Resource Conservation Programs	64				
		65		Program C-OSRC 7	a coastal permit exemption is suggested for forest/timber management. If best practices are observed, as suggested in the same paragraph, there should be no need for permit exemptions.	
	11.2 Other Initiatives	65	66	OSRC 10	imply a policy of clear-cutting oaks that appear to be infected with Sudden Oak Death. The California Native Plant Society should be consulted on these initiatives.	
				C-OSEC 12		Provide details on what these Sonoma Clean Power efforts are to promote and implement renewable and distributed energy systems.
12. References		67				Compile, refer to, and maintain a much more extensive inventory of available resources for current and future planning and management purposes. The list shown is woefully inadequate. All studies, research, ecological assessments and inventories, mitigation and monitoring plans, indigenous cultural information, and many more resources pertinent to the Sonoma County coast should be listed over time.
List of Tables	C-OSRC-1 Existing Dock & Berth Facilities for the Commercial Fishing Industry in Bodega Harbor	37				
		67-68		Chapter 12 References	Chapter 12 References The list shown is woefully inadequate. All studies, research, ecological assessments and inventories, mitigation and monitoring plans, indigenous cultural information, and many more resources pertinent to the Sonoma County coast should be listed over time.	Compile, refer to, and maintain a much more extensive inventory of available resources for current and future planning and management purposes.

List of Figures	ESHA maps		1-11	C-OSRC-2-ESH Map Series	The map series for ESHAs only recognizes steelhead presence in the Russian River, Salmon Creek, and Estero Americano. identified dependent steelhead populations from Spence et al. (2008) exist also in Kohlmer Creek, Fort Ross Creek, Russian Gulch, Scotty Creek, and tributaries of the Bodega Harbor.	Include identified dependent steelhead populations from Spence et al. (2008) existing also in Kohlmer Creek, Fort Ross Creek, Russian Gulch, Scotty Creek, and tributaries of the Bodega Harbor.
				C-2a - 2k	ESHA maps, there is no mention of the presence of Northern Spotted Owls, Mountain Lions, Northern Harriers, Golden and Bald Eagles, White-Tailed Kites, nesting birds in general or Townsend's/pallid or hoary bats, all of which are species of either full protection or special concern and have been observed or are highly likely to inhabit at least sub-areas 7 and 8. It is acknowledged that the maps are not "exhaustive". They should be exhaustive, erring on the side of greater ESHA protection and buffers, given the rapid loss of biodiversity with the current climate emergency. There is also no recognition or inclusion of coastal prairie, a disappearing habitat, which comprises a much larger proportion of the maps than is shown.	

Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Public Access</b>						
1. Introduction	1.1 Purpose	1				
	1.2 Relationship to other elements	1			Relationship to other LCP Elements: Land Use, Open Space and Resource Conservation, Agricultural Resources, Circulation & Transit, Public Facilities and Services.	add relationship to the "Public Safety Element": (6) The Public Safety Element establishes goals, objectives, and policies to minimize potential human injury and property damage by guiding future development (including public access) to reduce the exposure of persons and property to geologic, flood, and fire hazards. The policies in this Element are intended to avoid Public Access activities which would result in unacceptable risks to the residents, visitors, private property, public facilities, and infrastructure in the Coastal Zone; and to minimize risks for existing public access activities in hazard areas. Acceptable levels of risk are based on the nature of each hazard, the frequency of exposure, the number of persons exposed, and the potential damage.
	1.3 Scope & Organization	2				
2. Background	2.1 Overview of Recreation & Public Access	3	3	Last para	The need for more convenient and frequent transit should be acknowledged, and it should be made clear that on "peak use days" free parking may not be feasible at all locations. According to 2011-2012 County Park Visitor Data...	The need for more convenient and frequent transit should be acknowledged, and it should be made clear that on "peak use days" free parking may not be <b>available</b> feasible at all locations. Consider updated data sources - these data are 10 years old, and there has been a significant shift in visitor loads and usage patterns. Also, data should be gathered from State Parks as they manage more than 1/3 of the Sonoma Coastline.
	2.2 Legal Basis for Public Access	6				
3. Public Access Facilities	3.1 Facility Classification	8				
	3.2 Facility Acquisition	13				
	<i>Land Acquisition Priorities</i>	16	17	Policy C-PA-1c		Add after "where feasible...": Investigate the potential for parallel ridge and road trails as part of Coastal Trail implementation from Highway 1, Kruse Ranch Road, Timber Cove Road and Fort Ross Road, feeding inland to Sea View Road, to Meyers Grade Road, to Highway 1 near the Vista Trail entryway. Also, plan for a parallel ridge trail from Bridgehaven or Willow Creek upslope, to connect with the Wright Hill, Rigler, and Carrington properties.

	3.2.2 Acquisition Priority	16	18	Policy C-PA-1e	Protect areas where public prescriptive rights to the coast may exist by identifying all known routes historically used by the public in the project area when processing Coastal Permits or where public prescriptive rights to the coast appear to be threatened.	add (4) manage the use of public prescriptive rights in accordance with public safety, disaster response and emergency response capabilities
	3.2.2 Acquisition Priority	16	19	Policy C-PA-1j	Encourage owners of fee and non-fee private accessways which provide access to the public to continue to provide access to the public. If a landowner closes an access point to the public, measures to maintain the maximum amount of public access shall be assessed and feasible measures to maintain equivalent access implemented, including but not limited to negotiating an easement.	add: "feasible measures needed to maintain public access shall take into consideration public safety, disaster preparedness and emergency response capacities."
	3.2.2 Acquisition Priority	16	20	3.2.2 Policy C-PA-2d	The California Coastal Trail should use existing oceanfront trails and recreational support facilities to the maximum extent feasible	add/insert "Policy C-PA-2d.1: and the trail should be routed to minimize exposure to geological hazards such as tsunamis and earthquakes, and to optimize disaster response capability effectiveness."
		16	20	3.2.2 Acquisition Priority Trail location and alignment		Add "Policy C-PA-2e: Study and implement water trail connections from the Gualala River, Russian River and the Estero Americano to the Coastal Trail.
	3.2.2 Acquisition Priority	16	20	Trail location and alignment		Add: "Policy C-PD-2f: Investigate the potential for parallel ridge and road trails as part of Coastal Trail implementation from Highway 1, Kruse Ranch Road, Timber Cove Road and Fort Ross Road, feeding inland to Sea View Road, to Meyers Grade Road, to Highway 1 near the Vista Trail entryway. Also, plan for a parallel ridge trail from Bridgehaven or Willow Creek upslope, to connect with the Wright Hill, Rigler, and Carrington properties and on to Salmon Creek."
	3.2.2 Acquisition Priority	16	20	Trail location and alignment		Add "Policy C-PA-2g: Complete, in a safe manner for local residents, the Bodega Bay Trails Plan through the Bodega Bay community, using an inland route comprised of public lands and private property easements. A cost/financial analysis should be provided for all trail alternatives."
	3.2.2 Acquisition Priority	16	20	C-PA-2d	The California Coastal Trail should use existing oceanfront trails and recreational support facilities to the maximum extent feasible	add/insert "Policy C-PA-2d.1: .. the trail should be routed to minimize exposure to geological hazards such as tsunamis and earthquakes, and to optimize disaster response capability effectiveness."

	3.3 Facility Planning & Development	21	25	3.3.2, Parking	Parking improvements needed on the Sonoma County coast include developing new and enlarging existing parking facilities to reduce hazardous parallel parking, improving signs and entrances to and exits from parking facilities, and increasing capacity by delineating parking spaces. Parking improvements are most needed in the Sonoma Coast State Park area between Bodega Bay and North Jenner Beach, where traffic levels and demand for parking spaces are greatest. The Public Access Plan recommends parking improvements for various access points.	Add: "The number of parking spaces along the coast shall relate to the capacity of Highway 1. In addition, plans for parking expansion and improvements must be made in deference to realistic carrying capacity, bluff erosion effects and other impacts on environmental resources." The need for more convenient and frequent transit should be acknowledged, and it should be made clear that on "peak use days" free parking may not be available or feasible at all locations
	3.3 Facility Planning & Development	21	25	Parking	This statement could be interpreted to mean that more parking is needed, whereas more parking could make congestion worse. Since Highway 1 is eligible to be a scenic highway, slow traffic should not be mentioned as a problem in need of correction.	
	3.3 Facility Planning & Development	21	23		Insert at end of Facility Improvements	Access improvements and new public access developments should be accompanied by a financial plan that ensures that funds are available for the improvements.
	3.3.2 Planning and Development Considerations	23	23		Insert second para under Facility Improvements	Bilingual signage for parking, restrooms, emergency instructions, etc, should be provided at all coastal public access locations
	3.3 Facility Planning & Development Considerations	23	23	Policy 3.3.2	Needs and Demand	Add a paragraph that describes not only the "quality coastal experience" for visitors and tourists but also to residents (Residential Conflicts) and local infrastructure (emergency / disaster preparedness and resources, emergency communications, evacuation egress).
	3.3 Facility Planning & Development Considerations	23	24	Policy 3.3.2	Peak Use	reference to Short Tail Gulch as "Lightly Used" should be removed- this is no longer true at Peak Use; the impact on adjacent residential development (public safety, disaster preparedness, emergency access, emergency egress etc.) and coastal resources has increased with increased use of Short Tail...this is no longer a lightly used Trail
	3.3.2 Planning and Development Considerations	23	30	<i>Policy 3-PA-3t Public Access Facilities</i>		Add: Bilingual signage for parking, restrooms, emergency instructions, etc, should be provided at all coastal public access locations."
	3.3.2 Planning and Development Considerations	23	30	Policy C-PA-3r	At trailheads provide information about regulations, contacts in case of an emergency, natural resources, the potential for fires, and the need for user cooperation. (New)	Add at end: "...Include information about the impacts of domestic dogs on wildlife at all trailheads. Also include message about stewardship and impacts of marine debris on wildlife and human safety.

	3.3.2 Planning and Development Considerations	23	30	Policy C-PA-4a		"The following policies, in addition to policies in the Circulation and Transit Element, shall be used to achieve these Policy C-PA-4a: Encourage new parking facilities in conjunction with development of new public access facilities. Parking may be developed in phases as use levels increase. At public access facilities, provide the maximum parking capacity that does not reduce public safety or <b>adversely</b> impact the environment. (New)
	3.3.2 Planning and Development Considerations	23	31	Policy C-PA-4a "Locating and Developing Parking Improvements"	This policy needs to be qualified so as to protect the highway from congestion on high visitor days.	Encourage new parking facilities in conjunction with development of new public access facilities. Parking may be developed in phases as use levels increase. At public access facilities, provide the maximum parking capacity that does not reduce public safety or significantly impact the environment. (New)"
	3.3.2 Planning and Development Considerations	23	31	Policy C-PA-4d		Except on high visitor days, Maintain and provide free parking, subject to reasonable restrictions, at all public access points on the coast which do not contain special facilities in excess of restrooms, parking, gated access, trash enclosures, informational kiosks, and other minor amenities. If user fees are implemented for any coastal park areas, encourage discounts to County residents. (New GP2020 Revised)" On high-visitor days when parking charges are necessary to prevent overcrowding, low-income family discounts may be serve to preserve equitable access.
	3.3.2 Planning and Development Considerations	23	31	Temporary Events on Public Beaches	This concept of closing public beaches for private events is at variance with the California Coastal Act and should be deleted.	
	3.3.2 Planning and Development Considerations	23				
	3.3.2 Planning and Development Considerations	23	31		Facilitate "Access for All" Modify to account for high visitor days when free parking may not be practical.	
	3.4 Recreation Facility Management & Operation	31				

	3.4 Recreation Facility Management and Operation	31	33	Policy C-PA-5a	Public Access and Recreation Planning Policy States that "California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) environmental analysis of proposed State Parks or County Regional Parks projects shall include estimates of current and future visitor use and analyses of adequacy of the proposed facilities to meet county-wide visitor demand." (New)	add: "Planning shall include effects of future visitor use and adequacy of the proposed facilities on disaster preparedness, emergency communications and response resources, and evacuation capabilities."
4. Recreational Boating Policy		34				
5. Implementation Programs	5.1 Public Access Programs	36	36	Program C-PA-3	As with the comment re: Temporary Closure of Beaches on P31, this is in contradiction to the purpose of the Coastal Act and should be deleted.	Also any temporary Private event permit review must consider impacts to disaster preparedness of event such as availability of first responders, emergency communications, evacuation traffic management, effect on existing local resources in case of blocked egress roadways"
	5.2 Other Initiatives	36	36	Other Initiative C-PA-1	Partnership with private organizations has potential to increase fees and lead to privatization of public access resources. Any partnership contract agreement should be reviewed by CCC Counsel.	



Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Water Resources</b>						
1. Introduction	1.1 Purpose	1		3rd para	The Plan states the following concerning water quality degradation: "To achieve this purpose, water resource management should consider the amount of quality water that can be used over the long-term without exceeding the replenishment rates over time or causing long-term declines or degradation in available surface water or groundwater resources." The reference to an "amount of quality water that can be used over the long-term without exceeding the replenishment rates over time" is confusing, since water quality concerns a change in water quality parameters and/or pollution content rather than an "amount of quality water that can be used."	The sentence should be rephrased or omitted, and suggest the County request assistance from the North Coast Regional Water Quality Control Board in developing appropriate language for minimizing water quality degradation.
	1.2 Relationship to Other Elements	2				
	1.3 Scope & Organization	2				
2. Water Resources & Regulation	2.1 Water Cycle	2				
	2.2 Watersheds	3				
	2.3 Aquifers	4	4	1st para	The plan states that groundwater "is an important source of agricultural, industrial, and domestic supply in Sonoma County."	Add "environmental uses" to this sentence, since many streams in Sonoma County rely predominantly on groundwater inflow to maintain suitable flow volume and water quality.
			4		Some groundwater naturally contains dissolved substances that can cause health problems, depending on the concentrations and combinations of the substances present. According to the State Water Resources Control Board (State Board), groundwater is also often polluted by human activities that generate contaminants such as microorganisms, gasoline and diesel fuels, solvents, nitrates, pesticides, pharmaceuticals, and metals. The underground flow and concentration of these contaminants, as well as the intrusion of ocean saltwater into groundwater, can be influenced by the extraction of groundwater and changes in levels of groundwater and surface water.	Policy: Water quality is primary goal therefore, county shall set policy that protects water quality from all potential contaminants such as pesticides, nitrates and fossil fuels working in collaboration with the North Coast Water Quality Control Board and other expert Agencies.

			5	In fractured rock aquifers, groundwater is stored in the fractures, joints, bedding planes, and cavities of the rock mass. The Franciscan Complex is generally considered to be non-water bearing; water availability largely depends on the nature of the fractures and their interconnection. Groundwater is derived from local rainfall that has percolated down into the rock, existing in small fractures in the zone of saturated rock below the water table. NOAA: Section 3.2 - Plan downplays the ability of Franciscan geology to supply adequate groundwater accretion to streams and rivers throughout the county. Recent legal testimony presented during a water right hearing on the North Fork Gualala River challenges this viewpoint, instead explaining that bedrock springs in Franciscan geology can "play a significant role in maintaining the late summer base flows in many....."streams and rivers."	Policy: The County shall not approve any water draw project that affects neighboring properties and shall only use water study and water reports that have been conducted within the last 2 years.
	2.4 Water Rights	5			
			6	An appropriate right is a use-based right dependent upon physical control and beneficial use of the water, rather than any special relationship between land and water. Since 1914, all new appropriations of surface water require a permit from the State. Unpermitted draws along the Russian River have led to 39,000 AF of water missing on the Russian River. This has been well documented by Russian Riverkeepers, Bohemian and journalists.	Policy: The County shall take action to register the illegal water draws from the Russian River and require water monitoring. In such times of drought, no water shall be drawn in order to preserve native fish and other wildlife. Fines for continued use will be assessed at \$1,000 a day.
	2.5 Biotic Resources & Water	6			
			6	Biotic Resources and Water - Trees and other vegetation need and use water but also help maintain year-round water levels in streams and groundwater. In the fall, many trees stop absorbing water. Trees in exposed foggy areas reportedly increase precipitation. Trees in any location provide shade that cools the ground surface and reduces evaporation. Plants add moisture to the air through transpiration of water from their leaves.	Policy: The County shall require a 1:5 ratio for mitigation of any trees removed on the coastal areas. Coastal trees require years to mature compared to inland trees. As coastal trees improve water quality and water recharge, priority shall be given to keep in place as many trees as possible. Policy: The County shall use their authority for lead agency to review all logging that currently has been relegated to CalFire for transparency, climate change impacts, public input and accountability.
	2.6 Regulatory Framework	7			

			7	Paragraph 3	The Local Coastal Program is the standard of review for the Coastal Act Development Permits, issued by Sonoma County, including appeals to the Coastal Commission for Coastal Development Permits issued by Sonoma County. According to the draft document once SoCO adopts and approves the LCP no APPEALS to the Ca CC can be made. Can someone clarify this?	
3. Water Resources Policy		8				
	3.1 Minimize Water Pollution from Runoff & Other Sources	9				
			9	C-WR-1a	"... approval for any project proposed within 200 feet of an impaired surface water shall include as conditions of approval design features and mitigation measures to prevent impacts to the quality of such waters"	Coordinate with the Regional Water Quality Control Board and their definitions of impaired water bodies when determining streams and rivers that fall under this policy.
			9	Objective C-WR-1/1A		County shall prohibit all synthetic pesticides in the coastal zone to minimize water pollution, protect water quality, support native fish, native coastal plants and coastal wildlife including marine species.
			10 - 11	Policy C-WR-1d	Eliminate "feasible" from language entirely.	Avoid construction of new stormwater outfalls and direct storm water to existing facilities with appropriate treatment and filtration, <del>where feasible</del> . Where new outfalls cannot be avoided, plan, site, and design outfalls to minimize adverse impacts to coastal resources from outfall discharges, including consolidation of existing and new outfalls where appropriate. (New) (Model LCP)
			11	Policy C-WR-1e	Some developments have a greater potential for adverse impacts to water quality and hydrology due to the extent of impervious surface area, type of land use, or proximity to coastal waters or tributaries. As determined by Permit Sonoma, on a case-by-case basis, such developments may require Treatment Control Best Management Practices (BMPs) for post-construction treatment of stormwater runoff.	Policy: All permits that impact water quality at development sites shall be sent to the North Coast Regional Water Quality Board for review <i>before</i> a permit is issued.
			12	Policy C-WR-1h	This sets precedent to get signs for dogs on leash fines (set fines high), dune protection from driftwood sculptures that are becoming problems. Funding?	All projects which involve construction of new storm drain inlets or maintenance of existing inlets shall be required to <b>add a sign or stencil</b> to each inlet with the equivalent of this language: "No dumping, drains into creek/ocean." (New)
						Policy: The County will work with the BPUD to ensure that water for family occupied homes and affordable housing has primary water service.

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Legal testimony presented during a water right hearing on the North Fork Gualala River challenges this viewpoint, instead explaining that bedrock springs in Franciscan geology can play a significant role in maintaining the late summer base flows found in many ... streams and rivers ..." (extracted quote)

- 14 paragraph 2 Using information on geology and water yields, the County uses a four tier classification system to indicate general areas of groundwater availability. Class 1 are Major Groundwater Basins, Class 2 are Major Natural Recharge Areas, Class 3 are Marginal Groundwater Availability Areas, and Class 4 are Areas with Low or Highly Variable Water Yield. In addition to County mapping, the State regularly updates the maps of groundwater basins and prioritizes groundwater basins for sustainable management in the County.
- Policy: Class 3 and 4 water areas shall not allow development without water catchment to supplement or shall deny any development that will draw down water from current development. Seasonal water assessments studies shall be made during both wet and dry seasons before any consideration of water development is allowed. Property owners in the affected areas shall be contacted for input.

			15	Objective C-WR-2.1	<p>“Sustainable” wording shall be replaced with resilient. The Plan and associated policies do not require potential environmental impacts from pumping be analyzed or addressed prior to well development and pumping by an applicant. The direct diversion of surface flows can lower flow levels and stress rearing salmon and steelhead; groundwater pumping can also impact stream hydrology (Barlow and Leake 2012). Throughout coastal Sonoma County, alluvial aquifers are often interconnected to surface flow and, depending on geologic and morphologic constraints, can either augment or diminish that flow. Where the groundwater aquifer supplements streamflow, the influx of cold, clean water can be of critical importance to maintaining adequate water temperature and flow volume, especially during summer dry periods. Pumping from these aquifer-stream complexes can lower groundwater levels and interrupt the hyporheic flow between the aquifer and stream. When this happens, summer streamflow can recede degrading water quantity and quality to the point where juvenile steelhead and salmon may not survive. The Plan also fails to achieve congruence with an important California Superior Court decision on the Scott River finding that public trust resources, such as ESA-listed salmonids, must be protected from harm caused by extracting groundwater (Environmental Law Foundation, et al. v. State Water Resources Control Bd., et al., Case No. 34-2010-80000583, July 14, 2014). The court also determined that Siskiyou County, as a subdivision of the State, must consider public trust resources when issuing groundwater well drilling permits. The ministerial well permitting process proposed utilized by Sonoma County fails to consider public trust resources when issuing drilling permits.</p>	<p>Conserve, enhance, and manage groundwater resources on a sustainable <b>resilient</b> basis that assures sufficient amounts of clean water required for future generations, the uses allowed by the Local Coastal Plan, and the natural environment.</p>
			15	Objective C-WR-2.4	<p>Increase institutional capacity and expertise within the County to competently review hydrogeologic reports and data for critical indicators and criteria.</p>	<p>Policy: Reports and data shall include current and seasonal studies that include wet and dry seasons. Conserve, enhance, and manage groundwater resources on a sustainable basis that assures sufficient amounts of clean water required for future generations, the uses allowed by the Local Coastal Plan, and the natural environment.</p>

				<p>Increase institutional capacity and expertise within the County to competently review hydrogeologic reports and data for critical indicators and criteria. The Plan and associated policies do not at this time require potential environmental impacts from pumping be analyzed or addressed prior to well development and pumping by an applicant. The direct diversion of surface flows can lower flow levels and stress rearing salmon and steelhead; groundwater pumping can also impact stream hydrology (Barlow and Leake 2012). Throughout coastal Sonoma County, alluvial aquifers are often interconnected to surface flow and, depending on geologic and morphologic constraints, can either augment or diminish that flow. Where the groundwater aquifer supplements streamflow, the influx of cold, clean water can be of critical importance to maintaining adequate water temperature and flow volume, especially during summer dry periods. Pumping from these aquifer-stream complexes can lower groundwater levels and interrupt the hyporheic flow between the aquifer and stream. When this happens, summer streamflow can recede degrading water quantity and quality to the point where juvenile steelhead and salmon may not survive.</p>	<p>Policy: Reports and data shall include current and seasonal studies that include wet and dry seasons. Conserve, enhance, and manage groundwater resources on a sustainable basis that assures sufficient amounts of clean water required for future generations, the uses allowed by the Local Coastal Plan, and the natural environment.</p>
		16	16	<p>Policy C-WR-2e</p> <p>Encourage public water suppliers to monitor and report groundwater levels, yields, and other information on groundwater conditions. (GP2020 Revised) The Plan also fails to achieve congruence with an important California Superior Court decision on the Scott River finding that public trust resources, such as ESA-listed salmonids, must be protected from harm caused by extracting groundwater (Environmental Law Foundation, et al. v. State Water Resources Control Bd., et al., Case No. 34-2010-80000583, July 14, 2014). The court also determined that Siskiyou County, as a subdivision of the State, must consider public trust resources when issuing groundwater well drilling permits. The ministerial well permitting process proposed utilized by Sonoma County fails to consider public trust resources when issuing drilling permits.</p>	<p>Policy: Public water suppliers shall be required to seasonally monitor and publicly report current year groundwater levels, yields, and other information on groundwater conditions.</p>
	3.3 Public Water Systems	16			

	3.4 Water Conservation & Reuse	18				
			19	Goal C-WR-4		Policy: New construction must include water catchment to supplement scarce water supplies.
	3.5 Water Importing & Exporting	21				
			21			Policy: All unpermitted draws from the Russian River shall be put on Notice that permits are required, and no dry season draws will be allowed, in order to protect all users, and support biotic resources, including endangered salmonids.
			21	Policy C-WR-5b		Policy: A full EIR shall be required to assess environmental impacts for any proposals to import or export additional water into or from Sonoma County. Climate change impacts shall be included with current science.
	3.6 Watershed Management	22				
			22	Goal C-WR-6	Add:	Goal: County shall identify aquifer recharge areas in the coastal zone and protect those areas from development that will encroach on aquifer recharge for the benefit of coastal residents and all beneficial uses.
4. Implementation Programs		22				
	4.1 Water Resources Implementation Programs	22				
			23	Program C-WR-3	Eliminate, as recharge areas must be identified and protected: "Consider developing guidelines for development in Rural Communities that would provide for retention of the site's pre-development rate of groundwater recharge. (GP2020 Revised)"	"Consider developing guidelines for development in Rural Communities that would provide for retention of the site's pre-development rate of groundwater recharge. (GP2020 Revised)"
			23	Program C-WR-6	ADD:	All water studies shall be current within the last 2 years and include both wet and dry season water studies.
			24	Program C-WR-9	ADD:	(6) Any additions or new construction shall require water catchment offsets. (7) Greywater systems plans shall be required for new proposals or additions.
	4.2 Other Initiatives	25				
			25	Other Initiative C-WR-3		Policy: County shall take lead agency authority from CalFire on coastal timber harvests to ensure public transparency and liability for environmental protection will be sole responsibility of the county.
			26	Other Initiative C-WR-9		Policy: Due to climate change impacts, water resource data from public water suppliers shall be required and available to the public.
List of Tables	C-WR-1: Area of Watersheds & Subwatersheds of the Sonoma County Coastal Zone					

Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Public Safety</b>						
1. Introduction	1.1 Purpose	1				
	1.2 Relationship to Other Elements	2			The hazards addressed in the Public Safety Element and the sensitivity of various land uses have been considered in preparing the Land Use Element. Policies in the Land Use Element limits the range of land uses allowed in high hazard areas to reduce the number of people and structures exposed to risk. The Public Safety Element policies are also coordinated with the policies of the Open Space and Resource Conservation, Public Facilities and Services, Circulation and Transit, and Land Use Elements.	Change to: The hazards addressed in the Public Safety Element and the sensitivity of various land uses have been considered in preparing the Land Use Element. Policies in the Land Use Element limits the range of land uses allowed in high hazard areas to reduce the number of people and structures exposed to risk. The Public Safety Element policies are also coordinated with the policies of the Open Space and Resource Conservation, Public Facilities and Services, Circulation and Transit, Public Access, <b>Public Safety</b> and Land Use Elements.
	1.3 Relationship to Other Plans & Regulations	2			The hazards addressed in the Public Safety Element and the sensitivity of various land uses have been considered in preparing the Land Use Element. Policies in the Land Use Element limits the range of land uses allowed in high hazard areas to reduce the number of people and structures exposed to risk. The Public Safety Element policies are also coordinated with the policies of the Open Space and Resource Conservation, Public Facilities and Services, Circulation and Transit, Public Access, and Land Use Elements.	
		3-4	4	Sonoma County Hazard Mitigation Plan	Needs editing: ".....The Hazard Mitigation Plan also addresses erosion, erosion is the loosening and transportation of rock and soil debris by wind, rain, or other running water or the gradual wearing away of the upper layers of the earth, sea-level rise, and tsunami, as secondary hazards.	Change to ".....erosion. Erosion is the..... <b>tsunamis</b> , as secondary hazards." Also, a link to the Hazard Mitigation Plan should be included.
	1.3.4 CEQA	5	5	1st para	"The hundreds year flood is the magnitude of a flood expected to occur on the average every 100 years, based on historical data. The 100-year flood has a 1/100, or one percent, chance of occurring in any given year."	Remove the "s" from hundreds and add a last sentence: "Climate Change is increasing the frequency of hundred-year floods globally and at a rate more rapid than previously expected."
	1.4 Scope & Organization	5				
	1.5 Determination of Acceptable Risks	6				
2. General Hazards Policy		7				
		8	8	Policy C-PS-1e	Where there is a significant factual question about whether a particular development has sufficiently mitigated the potential risks from natural hazards to an acceptable level, the applicant shall provide evidence that the development would not cause damage or substantial adverse impacts on coastal resources. If the development is consistent with the Local Coastal Plan, and the property owner wishes to proceed in the face of a factual question regarding risks from natural hazards, the property owner shall provide indemnification to the County, insurance or other security, and a recorded notice which will protect the interests of the County and notify future purchasers of the property of the potential problem. (New/GP2020)	Change to: ".....the applicant shall provide evidence to the public as well as Permit Sonoma, that the development would not cause damage.....on coastal resources."



3. Geologic Hazards Policy	3.1 Background	9			The area in and around Bodega Bay are in the Alquist Priolo Zone and on the San Andreas Fault Zone should be addressed in the draft.	Accurate and complete mapping of faults should be included. Policies to prevent development in highly vulnerable earthquake zones should be specified.
		9				add Policy C-PS-1j: Plan response capacity and resources to natural hazards to be adequate or exceed projected peak-load residential and visitor-serving occupancy.
						Add Policy that develops disaster response options in case large and heavily populated/visited locations become landlocked due to unpassable roadways, such as establishing sea-side disaster response. The Bodega Harbour Community (South and North) have only a single point of entry, respectively, that gets easily blocked and impassable. Multilingual communication methods are recommended. Utilities resiliency should include an electrical grid with redundancy plus reliable and stable wireless capabilities including backup power sources for cell towers, communication with complete coverage, and reliable internet connectivity.
	3.2 Regulatory Setting	15	18	Policy C-PS-2e	Encourage the consolidation of lots and new structures in high hazard areas. (Existing LCP Revised)	Define and give example of "consolidation". The meaning is unclear.
4. Flood & Inundation Hazards Policy	4.1 Background	20				
			25	GOAL C-PS-3:	Prevent unnecessary exposure of people and property to risks of human injury and property damage from flooding and other types of inundation hazards	Add: "...exposure to people, property, wildlife, habitat and wildlife corridors.....to risks of injury and damage...."
			25	Objective C-PS-3.1	Regulate new development to reduce the risks of human injury and property damage from existing and anticipated flood hazards to acceptable levels.	Add: "Also regulate any effects new development would have in reducing floodplain storage capacity or endangering wildlife and habitat."
			26	Policy C-PS-d	New development, water diversion, vegetation removal, and grading shall be regulated to minimize any increase in flooding and related human injury and property damage. (GP2020)	Change the word "minimize" to "prevent".
	4.2 Regulatory Setting	25	26	Policy C-PS-3f	"Construction of structures within 100 feet of the top of any natural or manmade embankment which defines a channel shall be prohibited, except where Permit Sonoma finds the flood hazard risk to life and property has been minimized. Reductions to building setbacks in 100-year floodplains shall be avoided. Where this policy conflicts with C-OSRC-5c(2) of the Open Space and Resource Conservation Element, the more restrictive of the two shall apply. (Existing LCP Revised)	End the first sentence ".....channel shall be prohibited". Change "reductions to setbacks..... <i>shall be prohibited</i> ."
			26	Policy C-PS-3g	Assess potential hazards from proposed development on a case by case basis to ensure that siting, mitigation measures, or design changes are sufficient to reduce exposure to these hazards to an acceptable level. Such assessments shall consider hazards from river and creek flooding, dam failure, storm surge and high waves during storms, sea level rise, and undersized or blocked stormwater facilities.	Change to: "Assess potential hazards to coastal environmental integrity, including human, wildlife, plant and soil resources, from proposed development. Consider hazards from potential resultant soil erosion, river and creek flooding, dam failure, storm surge, high waves during storms, sea level rise, and undersized or blocked stormwater facilities. Ensure that siting, mitigation measures, or design changes are sufficient to render exposure to these hazards insignificant.
		25	27	Policy C-PS-3k:	"Policy PS-2d of General Plan 2020"	Provide a link or footnote for this reference.
5. Sea Level Rise Hazards Policy	5.1 Background	27	28	5.1.1 California Coast Sea Level Rise	please update this information to reflect more current data (eg, from the California Ocean Protection Council).	

		27	36	GOAL C-PS-4:	"Prevent unnecessary exposure of people and property to risks of injury or damage from sea level rise."	Insert: "...and property, wildlife and habitat, from...."
		27	36	Objective C-PS-4.1 and Objective C-PS-4.2	Make same insertion as for Goal C-PS 4	Insert: "...and property, wildlife and habitat, from...."
		27	37	3rd para, bolded	The following policies, in addition to others in this Public Safety Element and those in the Open Space and Resource Conservation, Water Resources, and Land Use Elements, shall be used to achieve these objectives	Please provide specific references to the policies mentioned from the other pertinent Elements.
		27	37	Policy C-PS-4c, last sentence:	"..... The report shall evaluate a range projected sea level rise based on the latest state guidance and include recommendations on development location, design, and construction to reduce risk from coastal hazards and enhance adaptability of the development coast. (New)	End the sentence after "...coastal hazards." The rest does not make sense.
		27	37	Policy C-PS-4d:	1st sentence: "New development shall be set back a sufficient distance landward or otherwise sited and designed to avoid or minimize, to the maximum extent feasible,	Change to : "...designed to <b>prevent</b> inundation..." Add
		27	37	Policy C-PS-4e:		Change to: "...completely avoided, the applicant will be advised that the development is unfeasible under state regulations at the outset of the application process. The County cannot held responsible for a "taking" due to prohibition of a predictably foolhardy development, any more than the development can be held responsible for causing damages to its surroundings in the future.
		27	38	Policy C-PS-4g		Add to first sentence: "...new development, including outbuildings and septic/leach fields." Add to 2nd sentence: "...sea level rise over the life of the building in tidally influenced ares..."
		27	38	Policy C-PS-4h		Change to: Permits shall not be approved for development subject to or potentially causing surrounding damage in the Geologic Hazard Area Zone, Flood Hazard Area Zone, and areas subject to inundation from sea level rise.." Applicants will be referred to the California Coastal Commission Draft Residential Adaptation Guidance, or successor document.
6. Wildland Fire Hazards Policy	6.1 Background	38	38	Last para	Most damage results from a few large fires in the dry weather months. There were 21 wildland fires of 100 acres or more in the County between 1989 and 2000.	Please update the number of fires through 2020 and increased number of months per year now expected for high fire risk due to climate change.
	6.1.1, Hazards and Risk Assessment	39	39		"Figures C-PS-6a-c are only a general picture....."	Please expand the details in Figures and update the wildland fire risks related to climate change.
	6.1.4 Fire Safety Standards	40	40		Please add a brief summary of the current Sonoma County Fire Safety Ordinance to end of 2nd para.	
	6.2 Regulatory Environment	41	42	GOAL C-PS-5:		Insert: "...people and property, <i>animals and habitat</i> , to risks of injury..."
		41	42		The following policies, in addition to those in the Land Use and Public Facilities and Services Elements, shall be used to achieve these objectives:	Please provide specific link to the applicable policies in the other Elements listed.
		41	42	Policy C-PS-5a		Insert: "...however, Cal Fire shall not direct brush clearing....in designated ESHA..." Consider adding Policy that encourages grazing as a form of wildlands fuel control, for example on the range lands in proximity to residential areas.

7. Hazardous Materials	7.1 Background	43	44	paragraph 2		Add as last sentence: "Please see Policy C-OSRC-7a, in the Open Space and Resource Conservation Element, which bans the use of synthetic pesticides in the coastal zone.
	7.2 Regulatory Setting	44	46	7.2.4 Sonoma County Hazardous Materials and Waste Lead Agencies and CUPAs		
				Policy C-OSRC-7a	Prevent unnecessary exposure of people and property to risks of injury or property damage from hazardous	Insert: "...property, <i>wildlife and habitat</i> , ..." Delete the word "property, where it occurs the second time in this policy.
		44	47		The following policies, in addition to others in this Public Safety Element and those in the Land Use and Public Facilities and Services and Water Resources Elements, shall be used to achieve these objectives:	Please provide specific links to the policies mentioned in the other Elements.
8. Implementaion Programs	8.1 Public Safety Implementation Programs	48	48	Program C-PS-1:	(3) Limit rebuilding of structures in vulnerable areas that have been damaged by storms or the impacts from sea level rise, including increased rates of erosion.	Substitute the word " <i>prohibit</i> " for the word "limit".
		48	48	Program C-PS-4	Protecting developments from natural hazards which they exacerbate by disturbing the existing environment is antithetical to the purpose of the LCP.	Delete this program.
		48	48	Program C-PS-3	Develop a Strategic Plan for and incorporate into existing plans, damage assessment and recovery of essential service buildings and facilities consistent with Policy PS-1n of the General Plan 2020. (GP2020)	Provide a direct link or copy the actual GP2020 policy referred to
		49	49	Program C-PS-5	(9) Development of mitigation measures to reduce or eliminate the potential for human injury and property loss from flood and inundation hazards, particularly in areas subject to repetitive property loss.	There is no point in requiring a mitigation report if the development is not feasible due to natural hazards.
		48	51	Program C-PS-13	This program is impractical and incompletely described and should be eliminated.	
	8.2 Other Initiatives	52	53	Other Initiative C-PS-6	Work with the California Department of Forestry and Fire Protection to identify areas of high fire fuel loads and take advantage of opportunities to reduce those fuel loads, particularly in Areas with Very High or High Potential for Large Wildland Fires and in High Fire Hazard Severity Zones. (GP2020) Cal Fire is not a trustworthy agency to direct the reduction of fire fuels in forested areas.	Selective timber harvest and prescribed burns shall be directed using the best new science available. Per above: Consider program to encourage grazing as a form of wildlands fuel control
9. References		54	53	Other Initiative (add C-PS-11)		Consider adding an initiative that focuses on adequate general disaster preparedness (independent of whether due to seismic events, fire, or other) under the context of a heavily tourism-impacted area, to include aspects such as properly funded and resourced first responder capacity, medical infrastructure, electrical grid redundancy and communications infrastructure, and emergency supplies (food, water, medical) for prolonged periods of isolation and with a high visitor load.

Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Circulation &amp; Transit</b>						
1. Introduction	1.1 Purpose & Background	1				
			1	1.1	2nd paragraph	The current traffic congestion [on] ALONG the coast has resulted from a combination of factors. Regional factors include growth in employment and population [primarily within Sonoma County's cities]. Local factors include increases in parkland ATTRACTIONS [acreage through expansions, acquisitions, and dedications]; in the number and length of trails and associated hiking opportunities; in access to the beach and ocean; and lack of public transportation. [Most importantly,] The public HAS FEW ALTERNATIVES TO [continues to prefer] the automobile as the primary means of transportation.
	1.2 Relationship to Other Elements	1				
	1.3 Scope & Organization					
2. Circulation & Transit System	2.1 Existing & Projected Transportation Systems in 2020	2				
		2	3	2.1.1	3rd para	Sonoma Coast State Park and Sonoma County public beaches are among the most visited parks northwestern California, generating significant weekend traffic congestion. With limited public transportation and lack of safe bicycle routes, most people HAVE BEEN [are] obligated to drive in order to enjoy the Sonoma Coast.
			3	2.1.1	In "Roadway Capacity and Conditions" Last sentence	DUE TO THE [With] narrow shoulders, LIMITED [inadequate] sight lines, and limited opportunity for safe passing, improving THE ADHERENCE TO SAFE SPEED LIMITS [road safety] is the primary concern along the entire length of Highway 1.

			4	in "Transportation Improvements" 1st para	MORE THAN THREE DECADES HAVE PASSED SINCE THE [In the 1985] California Department of Transportation (Caltrans) Route Concept Report Summary on State Highway 1, RECOMMENDED ROADWAY IMPROVEMENTS, BUT ONLY A FEW HAVE BEEN FUNDED AND BUILT. [Caltrans identifies the following potential roadway safety improvement projects: shoulder widening, passing lanes, channelization and intersection improvements to enhance turning movements, additional parking areas where unsafe parking conditions currently exist, and features that would minimize roadside parking on the highway. Safety improvements to State Highway 1 constructed since the last Local Coastal Plan Update in 1995 include left turn lanes at The Sea Ranch, at the intersection with State Highway 116 near Jenner, near The Tides restaurant, and at the Bodega Harbour Subdivision. Other improvements include stabilization projects north of Jenner, guardrails along the Russian River estuary, and the ongoing project to relocate Highway 1 along Gleason Beach.] IT IS UNCERTAIN THAT THIS SCENIC ROUTE WILL BE A HIGH PRIORITY FOR MANY ADDITIONAL PROJECTS.
					SHOULD FUNDING BECOME AVAILABLE, providing turning lanes at intersections and parking areas is the most effective approach to improving the SAFETY [capacity] of State Highway 1 while maintaining it as a two lane scenic highway. Addition of turning lanes provides considerable safety benefits as well as reducing traffic delays in Jenner, Bodega Bay, and near public beaches.
					Minor road improvements in the community of Bodega Bay will not relieve traffic congestion, and establishing a bypass route has proven infeasible. While capacity along this section of State Highway 1 will remain LIMITED, [inadequate,] there are MANY opportunities to improve [pedestrian] safety and reduce dependency on automobiles for [local] trips OF LESS THAN 3 MILES by adding pedestrian walkways, INTRODUCING SHARED ELECTRIC BICYCLE OPPORTUNITIES, restricting turning movements across traffic, and reducing vehicle speeds.
			4	2nd para	Reducing speed limits is the most practical way to <del>SHOULD FUNDING BECOME AVAILABLE, providing turning lanes at intersections and parking areas is the most effective approach</del> improve the <b>SAFETY</b> capacity of State Highway 1 while maintaining it as a two lane scenic highway. <del>Addition of turning lanes might provides considerable safety benefits as well as reducing traffic delays in Jenner, Bodega Bay, and near public beaches.</del>

<p>Other safety improvements THAT HAVE BEEN proposed for State Highway 1 are SIGNAGE TO ALERT MOTORISTS TO PEDESTRIANS AND CYCLISTS, selective widening and road alignments; parking management, development and enforcement programs; [and other types of road improvements such as] roadway striping and marking, bicycle lanes and pedestrian ways. Improvements to State Highway 1 such as construction of bicycle paths or widening of shoulders will be necessary to construct the Sonoma County segment of the California Coastal Trail (see discussion below).</p>	<p>3rd para</p>	<p>4</p>	<p>4</p>	<p>Minor road improvements in the community of Bodega Bay will not relieve traffic congestion, and establishing a bypass route has proven infeasible. While capacity along this section of State Highway 1 will remain LIMITED, [inadequate] there are MANY opportunities to improve [pedestrian] safety and reduce dependency on automobiles for [health] trips OF LESS THAN 3 MILES by adding pedestrian walkways, INTRODUCING SHARED ELECTRIC BICYCLE OPPORTUNITIES, rest[ing]-turning movements across traffic, and reducing vehicle speeds. AT PRESENT, MINIMAL public transit is provided by Mendocino Transit Authority and Sonoma County Transit. Mendocino Transit Authority and Sonoma County Transit operates bus route 95, which is the only year-round transit service along the Sonoma Coast. Service is CURRENTLY limited to a single daily trip running southbound to Santa Rosa in the morning and returning in the afternoon. This route provides a limited opportunity for coastal residents working in Sebastopol and Santa Rosa, but does not provide ADEQUATE [good] service for workers OR VISITORS. [Living in the coastal area that need to commute to jobs in the inland areas of Sonoma County] PROCEEDS OF A PARKING PASS RESERVATION PROGRAM FOR VISITORS SHOULD MIGHT BE CONSIDERED AS A MEANS OF REDUCING CONGESTION AND BY HELPING TO FUND FUNDING ADEQUATE PUBLIC TRANSPORTATION.</p>	<p>5th para</p>	<p>4</p>
<p>In "Active Transportation and Transit"</p>	<p>2.1.2</p>	<p>5</p>	<p>5</p>	<p>6</p>	<p>3.1 General Transportation Policies</p>	<p>3. Circulation &amp; Transit System Policy</p>
<p>and pedestrians.</p>	<p>GOAL C-CT-1</p>	<p>It is critical to reduce dependence on automobiles, both to maintain the scenic qualities of Highway 1, and to improve safety for cyclists</p>				

				Objective C-CT-1.1	<p><i>It would be better to state that: "The most likely way to initiate basic funding for much-needed public transit and shuttle services would be to establish an equitable public and private parking reservation system for the vicinity of Jenner, taking lessons from the parking reservation system and private and public shuttles that now serve Muir Woods. <a href="https://MarinTransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf">https://MarinTransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf</a> Such a system could be developed for destination parking areas that fill up most quickly on high-visitor days. An experienced public or private entity with a diverse advisory board representing public and private entities that own parking spaces, as well as visitors, residents, and employees of coastal entities, could administer such a system.</i></p>	<p>"Because the cost of needed improvements to the circulation and transit system are likely to range from \$10 million to \$30 million per year, launch projects that will increasingly attract Federal and State grants to supplement local fees, taxes, and bonds."</p>
						<p><i>It would be better to state that: "The most likely way to initiate basic funding for much-needed public transit and shuttle services would be to establish an equitable public and private parking reservation system for the vicinity of Jenner, taking lessons from the parking reservation system and private and public shuttles that now serve Muir Woods. <a href="https://marintransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf">https://marintransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf</a> Such a system could be developed for destination parking areas that fill up most quickly on high-visitor days. An experienced public or private entity with a diverse advisory board representing public and private entities that own parking spaces, as well as visitors, residents, and employees of coastal entities, could administer such a system.</i></p>
				Objective C-CT-1.2	<p>There are limits to expansion of the road network and parking areas can not reasonably be expanded to support rising numbers of automobiles visitors. Therefore, it is important to: . . . . (see change)</p>	<p>Develop a convenient and reliable system of public and private buses, shuttles, TNC services, vans, bike-share services, and pathways that will make it practical and attractive for increasing numbers of visitors to park automobiles at inland locations.</p>
				Objective C-CT-1.3	<p><i>Because the Air Resources Board Staff has predicted that California's vehicle miles traveled must be reduced by 25% by — reductions at the rate of about 1% per year in vehicle miles traveled are most likely to be required for the Local Coastal Zone. The objective must be:</i></p>	<p>"Steadily reduce vehicle miles traveled as well as greenhouse gas emissions to comply with State and regional requirements."</p>

				Objective C-CT-1.3 cont.	<i>Because the Governor's Office of Planning and Research has recognized that California's vehicle miles traveled per capita must be reduced, declines at the rate of about 1% per year are likely to be required for the County and the Local Coastal Zone should assume a similar requirement. Calif. Office of Planning &amp; Research, Technical Advisory on Evaluating Transportation impacts in CEQA, Dec. 2018, p.2: . . . to achieve the State's long-term climate goals, California needs to reduce per capita VMT. This can occur under CEQA through VMT mitigation. Half of California's GHG emissions come from the transportation sector 3 , therefore, reducing VMT is an effective climate strategy, which can also result in co-benefits. 4 Furthermore, without early VMT mitigation, the state may follow a path that meets GHG targets in the early years, but finds itself poorly positioned to meet more stringent targets later. For example, in absence of VMT analysis and mitigation in CEQA, lead agencies might rely upon verifiable offsets for GHG mitigation, ignoring the longer-term climate change impacts resulting from land use development and infrastructure investment decisions. As stated in CARB's 2017 Scoping Plan: <a href="https://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf">https://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf</a></i>	SB 375 and the Air Resources Board call for California's vehicle miles traveled to per capita must be reduced, by about 25% at the rate of about 1% to 3% per year in order to achieve carbon neutrality by the year 2050. Plans for are likely to be required for the County and the Local Coastal Zone will should assume a similar requirement be consistent with this trend.
				Objective C-CT-1.5	<i>Since automobile travel is sensitive to pricing and the attractiveness of alternatives such as cycling and walking, the emphasis should be to:</i>	"Reduce the use of automobiles by the workforce through a jobs/housing balance of approximately 1.5 jobs within walking and cycling distance of each year-round residence, and by assuring access to a safe network of bicycle-pedestrian pathways."
			6 & 7	Objective C-CT-1.6	<i>Within the Coastal area, the objective should be to</i>	"Encourage projects that are designed to encourage active transportation, such as the use of pathways, bicycles, vans and shuttles."
			7	Policy C-CT-1b	<i>Because the best way to reduce driving is to make drivers aware of the costs, this policy should be to:</i>	Require all new developments and all significant improvements to existing developments to unbundle parking costs so that users who bicycle, walk, or use transit are not required to pay for parking.
	3.2 Public Transit & Motor Vehicle Trip Reduction (GP2020)	7		Goal C-CT-2	<i>Because State law as well as regional policies require vehicle miles traveled to be steadily reduced, this goal should state:</i>	"Decrease vehicle miles traveled by approximately 1% per year, and provide for increasingly attractive alternative means of travel to and within the Coastal Zone."
				Objective C-CT-2.6	Where is C-CT-2.6?	
				Objective C-CT-2.10	<i>Because some roads are currently unsafe for cyclists and pedestrians at present, this objective should read:</i>	Assure that all roads have speed limits consistent with safe use by cyclists, pedestrians and drivers, considering the design and condition of existing shoulders, paths, roadways, and bike lanes.
			8	Policy C-CT-2c	<i>It would more clear to say:</i>	On transit routes, provide turnouts for bus operations.



				Policy C-CT-2d		[Wherever-feasible.] Require development projects to UNBUNDLE THE COST OF PARKING, AND WHEREVER FEASIBLE TO implement measures that increase the average occupancy of vehicles, such as: (GP2020 Revised)
			Pages 9 - 16		THE BICYCLE COALITION SHOULD LOOK AT THE BIKEPED SECTIONS. The national highway entities that are auto-oriented have specifications for bicycle elements of road projects that are not optimal (or safe) for bicycles. IN BICYCLE & PEDESTRIAN FACILITIES, <b>INCLUDE DEFINITION OF CLASS IV BIKEWAYS</b>	INCLUDE DEFINITION OF CLASS IV BIKEWAYS
			12	Policy CT-3.j	this could create some problems	
	3.3 Road Capacity	16		Objective C-CT-4.1		REDUCE VEHICLE MILES TRAVELED IN ORDER TO Maintain an LOS C or better on roadway segments unless a lower LOS has been adopted.
			17	Policy C-CT-4e		IMPLEMENT MEASURES TO REDUCE VEHICLE MILES TRAVELED ON [Designate and-design] Rural Principal and Minor Arterial Roads [as highway routes] that carry large volumes of intercity traffic [and that place priority on the flow of traffic rather than on access to property. The following policies apply to Urban and Rural Arterials]:
				Policy C-CT-4e (2)		DELETE
				Policy C-CT-4e (3)		DELETE
				Policy C-CT-4e (4)		DELETE
			18	Policy C-CT-4j		AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, consider intersection management improvements at key intersections throughout the coast as needed to address intersection congestion and long delays for turning movements. These may include installation of traffic signals, signal timing, re- striping, lengthening, turn lane additions, or other improvements, provided the improvements are consistent with the applicable road classifications and protection of coastal resources. (GP2020/Existing LCP)
				Policy C-CT-4k		Construct improvements such as realignment, signalization, roundabouts, turn restrictions, [one-way-streets.] and traffic calming at the following intersections to improve safety at the following intersections: (GP2020/Existing LCP revised)
				Policy C-CT-4m		AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, Consider constructing the following sets of road improvements to increase the capacity and safety of State Highway 1 in Jenner:
				Policy C-CT-4n		AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, Consider providing turn lanes at The Sea Ranch intersections listed below. An intersection improvement of lower priority could be constructed before an intersection improvement of higher priority if funding is available.

			20	Policy C-CT-4q		AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, consider Implementing the following [capacity and] safety improvements along State Route 1:
				Policy C-CT-4s		While providing for REDUCTIONS IN VEHICLE MILES TRAVELED [capacity] and safety improvements, ensure that State Route 1 shall remain a scenic two-lane highway within rural areas. (New)
	3.4 Phasing & Funding of Improvements Policy	21		Goal C-CT-5		Integrate the funding and development of planned circulation and transit system improvements with countywide transportation planning efforts, REDUCTIONS IN VEHICLE MILES TRAVELED, and land use planning and development approval. (GP2020)
				Objective C-CT-5.3		Maintain acceptable Levels of Service as set forth in this Element by REDUCING VEHICLE MILES TRAVELED [implementing funding-strategies for planned-improvements].
				Policy C-CT-5a		Review and condition development projects to assure that the REDUCTIONS IN VEHICLE MILES TRAVELED [LOS] and/or public safety objectives established in Policies C-CT-4a and C-CT-4b are being met. If the proposed project would result in INCREASED VEHICLE MILES TRAVELED [an-LOS worse than these objectives], consider denial of the project. [unless one or more of the following-circumstances exists:
				Policy C-CT-5a (1)		DELETE
				Policy C-CT-5a (2)		DELETE
				Policy C-CT-5a (3)		DELETE
				Policy C-CT-5b		Require that new development REDUCE VEHICLE MILES TRAVELED, AND [provide project-area improvements necessary to] accommodate vehicle and transit movement in the vicinity of the project, including [capacity-improvements,] traffic calming, right-of-way acquisition, access to the applicable roadway, safety improvements, and other mitigation measures necessary to accommodate the development without inhibiting public access. (GP2020 Revised)
4. Implementation Programs	4.1 Circulation & Transportation Implementation Programs	22		Program C-CT-1 (2)		Assesses REDUCTIONS IN VEHICLE MILES TRAVELED [the-level-of-service (LOS)] and how well planned improvements are IMPROVING ACTIVE TRANSPORTATION OPTIONS TO KEEP [keeping] pace with Countywide growth and development;
				Program C-CT-1 (6)		Is capable of modeling weekend and off-peak travel demand in order to MINIMIZE VEHICLE MILES TRAVELED DUE TO [plan-for] tourism and special eventS [traffic].
					Change last para	Consider the use of moratoria or other growth management measures in areas where the monitoring program shows that the LOS objectives are not being met due to POTENTIAL INCREASES IN VEHICLE MILES TRAVELED [lack-of-improvements]. (GP2020)

				Program C-CT-2		Monitor traffic volumes on County-maintained road segments, and ADJUST PARKING PERMIT CHARGES TO PREVENT <del>[work with Caltrans on similar State Highway 1 segments that are projected to experience]</del> unacceptable Levels of Service during peak weekend periods, particularly in the summer and fall months. Assemble these data for use in future assessment of THE PARKING PERMIT SYSTEM TO IMPROVE <del>[development project impacts on]</del> weekend traffic patterns. (GP2020)
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Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Public Facilities &amp; Services</b>						
1. Introduction	1.1 Purpose	1				
	1.2 Relationship to Other Elements	1				
	1.3 Scope & Organization	1				
2. General Policy for Public Facilities & Services		2		2.2.1	The Public Service section evaluates water, waste disposal, emergency and education services. Generally, the coast is water scarce area, and land conditions are poor for septic systems. This lack of basic services limits development potential in most areas. The Sea Ranch and Bodega Bay become the main growth areas. Because the coast has a small population spread over large distances, emergency and education services are limited. It is not expected this situation will change substantially in the future. (from 1981 LCP,	
3. Water & Wastewater Treatment & Disposal Services Policy		2				
	3.1 Water Services	3				
	3.1 Water Services	8	8	Last paragraph	"The Most recent Municipal Service review of the Bodega Bay District by LAFCO was in 2004.... Updated policy for water needs of any new development should be based on most current data and science and the impact on existing water resources and facilities.	
	3.2 Wastewater Treatment & Disposal Services	10				
	3.2.1 On Site Wastewater Treatment Systems	11	19			
			19	Policy C-PF-2a	"Development, including land divisions, shall be prohibited unless adequate water and wastewater treatment and disposal capacities and facilities exist to accommodate such development.	Insert ...."exist <i>on-site</i> to accommodate.....". Add: "OSA should be last option and only if all other options for onsite disposal allowed by Public Health and the Basin plan are not feasible."

			19	Policies C-PF-2b and C-PF-2e	These policies differs from the last LCP radically in allowing for development outside of designated urban service boundaries. Last LCP language should be maintained: "Insure that adequate water capacity is reserved to serve the first three priority developments listed below as they are proposed in the Phase I development plan for Bodega Bay, by requiring that if water supplies do not prove adequate to all land uses designated in the Phase I plan, a minimum of 30 percent of the projected available amount shall be reserved for the designated priority uses. A similar standard shall be applied to Phase II development if necessary; • moderate expansion of marina facilities and fishing-related commercial facilities • local serving commercial facilities • affordable housing projects (50 units)	Maintain the 2001 LCP's limitation of new public water and wastewater to within designated urban services boundaries. In cases in which several septic systems fail in a cluster, rather than extending sewer services outside urban boundaries, an invitation to sprawling development, require onsite wastewater treatment systems.
			19	Policy C-PF-2d	In the event that a master plan or monitoring fails to show adequate facilities or supplies for existing development, zoning changes, building permits, or other entitlements in order to protect services to existing residents.	The last sentence is incomplete and renders the policy incomprehensible
			20	Policy C-PF-2d (7)	A program to reduce stormwater infiltration. (GP2020)	Should be "A program to enhance ( <i>not reduce</i> ) stormwater infiltration." Aquifer recharge is <i>desirable</i> .
			20	Policy C-PF-2e (2)	"Where several failing OWTs or other health and safety problems which pose a significant hazard to human health and safety exist outside an Urban Service Area that could be addressed by extension of public sewer service, use Outside Service Area Agreements which limit the use of existing development. The evaluation should assure sufficient capacity to serve existing connections and potential buildout in the existing Urban Service Area. "	OSA should be the last option and only if all other options for onsite disposal allowed by Public Health and the Basin Plan are not feasible.
			20	Policy C-PF-2e (1)	The property must adjoin the Urban Service Area Boundary, or the proposed connection to a public sewer system must be no more than 200 feet from the Urban Service Area Boundary	Change to "no more than 100 feet....".
			20	Policy C-PF-2g	Extension of public water service to a property that is outside the boundary of an Urban Service Area or Rural Community (i.e., Duncans Mills, Jenner, Sereno del Mar, Carnet, Salmon Creek, Timber Cove, and Valley Ford) shall be avoided. Exceptions to this policy shall be considered, to the extent allowed by law, only:	Change the word "avoided" to " <i>prohibited</i> ".

			21	Policy C-PF-2j	When considering formation of new water service agencies, systems owned and operated by a governmental entity shall be favored over privately or mutually owned systems. New privately or mutually owned systems shall be authorized only if system revenues and water supplies are adequate to serve existing and projected growth for the life of the system, which shall be ensured through agreements or other mechanisms that set aside funds for long-term capital improvements and operation and maintenance costs. (GP2020)	Eliminate everything after the first sentence. "Privately or mutually owned systems" should not be allowed in public parks or recreation areas.
			21	Policy C-PF-2l	New privately owned package treatment plants which serve multiple uses or serve separate parcels shall be avoided.	Change the word "avoided" to " <i>prohibited</i> ".
			22	Policy C-PF-2p:	The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority consistent with coastal priority land uses of the Coastal Act. (New)	Cut the last sentence. There should be no further development of visitor-serving commercial recreational facilities on the Sonoma Coast, which does not and should not have the infrastructural capacity to support them.
4. Parks & Recreation Services Policy		22	22		This framing of the role of further park and recreational facilities puts the cart before the horse. The coastal zone is already experiencing tourism in excess of its public safety, transportation, facilities and services carrying capacity. Rather than increasing development to meet population growth and demand, it is time to safely manage and limit the amount of recreational use we already have.	
			23	Goal C-PF-3: Provide adequate park and recreation services on the Sonoma County coast.	These goals, objectives and policies are in support of a mistaken premise—that the Sonoma County Coastal Zone has an unlimited capacity for recreational development. It does not. Its unique qualities are already being degraded by an excess of recreation and tourism. <b><i>This section should be entirely changed to reflect that reality.</i></b>	
			23	Policy C-PF-3c:	Continue to implement park impact mitigation that allows for the dedication of land, the payment of fees, or both as a condition of approval for development projects. (GP2020)	Drop this policy. Parks in the fragile and unique coastal zone should not need " <i>mitigation</i> ".
5. Public Education Services Policy	5.1 Schools	23				
6. Fire Protection & Emergency Medical Services Policy	6.1 Fire Protection Services	27	27	4th para		The Sea Ranch Fire Dept name has changed to the North Sonoma Coast Fire District.
	6.2 Emergency Medical Services	29				
7. Law Enforcement Services Policy		31				
			32,	First sentence, 4th para	New development on the coast will increase pressure for additional law enforcement	will" to " <i>would</i> ".
			32	5th para, 1st sentence	Parking management is another law enforcement responsibility which may increase as a result of implementation of this Local Coastal Plan.	Change to: "...which has increased due to growing visitor numbers." Drop the second sentence, which mistakenly pre-supposes further coastal development

			33	Goal C-PF-6:	Ensure that law enforcement services are provided to meet the future needs of Coastal Zone residents and visitors."	Change to: "... meet the <i>current</i> needs of residents and visitors."
8. Solid Waste Management Services Policy		33				
				Goal C-PF-7	Ensure that solid waste management facilities are sited to minimize adverse impacts on the Coastal Zone environment	Change to: No solid waste facility shall be located in the Coastal Zone."
			35	Policy C-PF-7a:		Add "(9): The use of solid waste for agricultural application shall be guided by Sonoma County Public Health guidelines." Various forms of infection are transmissible through solid waste.
9. Public Utilities Policy		35				
10. Youth & Family Services Policy		37				
11. Implementation Programs	11.1 Public Facilities & Services Programs	39				
	11.2 Other Initiatives	40	40	Other Initiative C-PF-1	Consider preparation on a regular basis of a total water supply and use budget for the Sonoma County Coastal Zone to aid in land use planning and decision-making. Encourage Coastal Zone water service providers to prepare individual water supply and use budgets on a regular basis to provide the necessary information for the total water supply and use budget. (New)	Utilize CDWR and County Water Board guidance in formulating any aquifer estimates and long-term sustainability of local water supplies.

Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Noise</b>						
1. Introduction	1.1 Purpose	1				
	1.2 Relationship to Other Elements	1	2	1.2.3	This section should include the impacts of noise on ESHA. See Section 3, Noise Policy, for suggested changes.	Add: "...recreational experience. Excessive noise also adversely affects certain ESHAs which provide animal and bird corridors and habitat. Thus.....planning for quiet wildlife habitat and corridors as well as for quiet human recreational experience.
	1.3 Scope & Organization	2				
2. Noise Background	2.1 Methods of Noise Analysis	3				
	2.2 Noise Sources	6	6-7	2.2.2	ESHA and wildlife corridors should be accounted for in assessing the impact of all noise sources and vibrations on wildlife corridors and ESHAs currently, and provide protective policy for future noise and vibratory impacts.	
3. Noise Policy	3.1 Land Use Compatibility & Project Review	10	10	Goal C-NE-1	"Protect people from the adverse effects of exposure to excessive noise and to achieve an environment in which people and land uses may function without impairment from noise.	Change to: "Protect people <b>and wildlife</b> from the adverse effects..... environment in which people, <b>wildlife</b> and land uses...."
		11	11	Policy C-NE-1a	"Designate areas in the Sonoma County Coastal Zone as noise impacted if they are exposed to existing or projected exterior noise levels exceeding 60 dB Ldn, 60 dB CNEL, or the performance standards of Table C-NE-2. (GP2020)"	Insert: "...exterior noise levels exceeding those proven to have adverse wildlife impacts or existing or projected noise levels exceeding....."
		11	11	Policy C-NE-1b		Add to 1st sentence: "...noise impacted areas, including ESHAs and wildlife corridors, unless...." and 2nd sentence: "For human noise impacts ....." Add to end of Policy: "For ESHA, wildlife corridors, and marine wildlife noise and vibration standards based on modern scientific evidence of impacts on specific wildlife shall be utilized in setting standards."
		11	11	Policy C-NE-1c (5)	Noise levels may be measured at the location of the outdoor activity area of the noise-sensitive land use, instead of the exterior property line of the adjacent noise- sensitive land use where:	Insert: "...measured at the location of the <b>ESHA buffer zone/wildlife corridor</b> or at the location of the outdoor..."
		11	12	Policy C-NE-1c (5), at end	This exception may not be used on vacant properties which are zoned to allow noise- sensitive uses	Insert: "...vacant properties, <b>ESHAs or wildlife corridors</b> which are zoned....."
		11	12	Policy C-NE-1d (4)		Add to last sentence: ".....adequately characterize the impact to <b>humans and wildlife.</b> "
	3.2 Transportation Noise	13	13	Objective C-NE-2.2		Change to: "...so that <b>there is no</b> extension..."
		13	14	Policy C-NE-2e		Insert: "...69 dBA Ldn or <b>lower, consistent with wildlife impacts</b> , or as estimated...."
4. Implementation Programs	4.1 Noise Programs	14	14	Program C-NE-1		(1) Include an impartial wildlife biologist, such as Brendan O' Neil or Jennifer Michaud. (3) Insert: "...to protect persons <b>and wildlife</b> from existing...". (5) add at end "use, ESHAs or wildlife corridors." Drop (7). (8) drop "...and variances..."



	4.2 Other Initiatives	15		C-NE1	Traffic, especially motorcycles and heavy trucks along highway north of Jenner cause noise disturbance to the harbor seal rookery. We need enforcement of noise regulations in this area and any area where high speed highway traffic abuts an ESHA.	
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Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Glossary</b>						
					<p>Use of the terms Coastal "Plan" and Coastal "Program" are used in the Introduction, with some explanation, but make it difficult to understand the title of the Update as a "Plan".</p> <ul style="list-style-type: none"> <li>- From the Glossary</li> <li>- From the Introduction</li> </ul> <p>Generally, it will be helpful in many instances throughout the Update to have definitions for "accessory", "incidental", "secondary", (in addition to definitions such "Accessory Building/Dwelling Unit", "Incidental Sales" because those terms are specific, but the words are used more broadly throughout the document). Also, it will be important for future decision makers to have a clear understanding of what is intended by the words "primary", "predominant" and "prevailing".</p>	
	AASHTO Road Classification	1	1	Rural Local Road	<p>This section should reference "the classifications used in the latest AASHTO standards". For example, current AASHTO bike facility design standards date from 2012 and are long overdue for updates (consultant work was completed in 2019 and are expected to be certified by AASHTO soon). In fact, guidelines published by other standards organizations (e.g., NACTO) may be both more current and relevant to non-automobile roadway users (especially for some highway funding grant opportunities). Most importantly, classification definitions defined in the Glossary should not hardcode automobile-centric speed limit bound definitions into the General Plan. Geometry and other safety-related classification criteria should be added to improve equity among all roadway users. "For roads with design speeds of less than 40 mph and volumes under 400 vehicles per day, the standard road width is 22 feet, with the exception of steep or hilly terrain, where the width may be reduced."</p>	Strike the portion of the existing definition after the words "...22'." Add: "Adherence to California's State Board of Forestry guidelines for fire-safety requires 20' minimum roadway width for any new development."
	Definitions & Commonly Used Terms	2	1			
				"Accessory Building"		A subordinate building, the use of which is <del>incidental</del> <i>accessory or subordinate</i> to

		2		Accessory Dwelling Unit	Section 26C-325.1 is no longer compliant with state law (Gov Code 65852.2). It needs to be updated. General Plan should not cite a county code that has been superseded by state law. "An accessory dwelling unit may also be provided as an efficiency dwelling unit and/or a manufactured home, as defined in this section. Also known as Second Dwelling Units."	Strike this portion of the definition, as it presumes policy which has not yet been approved in the coastal zone.
		3		Agricultural Production Activities		
		3		Agricultural Support Services		
		3		Agricultural Tourism	"Agriculturally based operation or activity that brings visitors to a farm or ranch in order to promote the sale of agricultural products produced on-site."	Change to: "Agriculturally based operation or activity that brings visitors to a farm or ranch in order to promote the sale of agricultural products <i>fully produced on-site or within Sonoma County.</i> "
		3		Agriculture		Add: "Alcohol and cannabis production are not considered agricultural products in the coastal zone."
		4		Aquaculture	"That form of agriculture devoted to the propagation, cultivation, maintenance, and harvesting of aquatic plants and animals in marine, brackish, and fresh water. "Aquaculture" does not include species of ornamental marine or freshwater plants and animals not utilized for human consumption or bait purposes that are maintained in closed systems for personal, pet industry, or hobby purposes. Aquaculture products are agricultural products, and aquaculture facilities and land uses shall be treated as agricultural facilities and land uses in all planning and permit-issuing decisions governed by the California Coastal Act."	Reflect the current legal definition, code, and jurisdiction of other agencies in determining aquaculture policy by <b>dropping the last sentence</b> (see <a href="https://permits.aquaculturematters.ca.gov/Permit-Guide">https://permits.aquaculturematters.ca.gov/Permit-Guide</a> )

		4		Bicycle/Pedestrian Pathway Bikeway	Definition(s) should be added or updated to cite terms used in the NACTO Urban Bikeway Design Guide and other commonly cited Bikeway definitions. In particular, the Class 4 "Separated Bikeway" type should be included. In addition other newer bicycle, e-bicycle, scooter, and pedestrian-related user type and facility type definitions should be added to the Glossary to improve clarity and avoid confusion. These include: Intersection Treatments, Bike Boxes, Median Refuge Island, Raised Cycle Tracks, Two-way Cycle Tracks, etc.	Change Glossary name to (Bicycle/Pedestrian Pathway). Change to: Any facility that explicitly provides for bicycle or pedestrian travel. <del>Bikeways</del> Such paths are classified into <del>three</del> four types denoting a degree of <del>separation</del> protection from the <del>highway</del> vehicular traffic, as follows: Class 1 (completely separated right-of-way designated for the exclusive use of bicycles, pedestrians and other non-motorized travel), Class II (a restricted right-of-way designated by pavement stripes or green paint for the exclusive or semi exclusive use of bicycles), and Class III (a shared right-of-way designated by signing or stenciling on pavement), and Class IV (a protected right-of-way on a road or street for the use of bicycles, scooters, etc.)
		4		Biotic Resource Area	"Unique or significant plant or animal communities, including estuaries, fresh and salt water marshes, tideland resources, riparian corridors and certain terrestrial communities."	Drop "unique or significant". Change to: Natural resources naturally occurring for the purpose of survival of humans and other living organisms that include plant or animal communities, including estuaries, fresh and salt water marshes, tideland resources, riparian corridors and certain terrestrial communities.
						Define "carrying capacity"

		5		Channelization	This refers only to intentional channelization, such as constructed flood control channels. These types of projects occurred in the past but are rare nowadays. Also, channelization is often an unintended consequence of confining an alluvial stream channel, such as using bank stabilization to prevent lateral scour. This cause of channelization is much more common in SoCo currently.	
		6		Clear Cutting	elaborating on what exactly clear cutting entails (i.e., cutting all trees in a timber harvest area) would benefit this definition.	
		6		Coastal Plan	*ADD definition of Coastal Program - see pg 14	
		6		Coastal-related development	"Any use that is dependent on a coastal-dependent development or use."	Change to: " <i>Any development or use that is secondarily dependent on coastal-dependent development or use.</i> "
		6-7		Coastal redevelopment	This is an entirely new term and is not traceable to any Element in the document. It allows for discretionary permitting of development in the coastal zone which could impact ESHA, habitat corridors, traffic, viewsheds, water and septic, and erosion potentials.	Omit this term from the Glossary, as it covertly sets discretionary permitting policy.
		7		Coastal Prairie and Grassland	"Discontinuous grassland usually within 100 km of the coast; usually on southerly facing slopes or terraces. This habitat type is characterized by a mixture of heavily grazed, introduced annual grasses and some native perennial grasses, generally underlain by sandy to clay loam surface soils. This mapping category does not indicate pristine coastal prairie."	Change to: California's coastal prairies are protected by the California Coastal Act, which considers these habitat types to be Environmentally Sensitive Habitat Areas (ESHA). Akin to the endangered species act for habitat types on California's coast, ESHA protections disallow any harm to so designated habitats, except where such harm is necessary to otherwise restore the habitat as a whole (e.g., prescribed fire, grazing). Wikipedia

		8		Conservation	"The management of natural resources to prevent waste, depletion, destruction, or neglect."	Change to: "The protection, preservation, management, or restoration of natural environments and the ecological communities that inhabit them, creating resilience to future threats."
		8		Cumulative Effect	Both NEPA and CEQA would require a larger view.	add: and reasonably foreseeable projects
		8		Development	<p>Currently, agriculture development that harvests or removes "major vegetation" is exempt from the protections intended for coastal habitats and species. PRC 30106.</p> <p>These activities are subject to County jurisdiction and land use powers. They have the potential to create threats and cause actual harm to coastal features including those mentioned above. As defined leaves a loophole for agriculture "[t]he purpose of this Local Coastal Plan Update is to revise the LCP to reflect policies related to coastal "development" ... Development is defined as, ".... alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than for agricultural purposes, kelp harvesting, and timber operations ...".</p>	<p>Remove this exemption. .... alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation (like uncultivated or lightly cultivated grasslands, woodlands, or forests), INCLUDING new or intensified agricultural purposes, kelp harvesting, and timber operations ..."</p>
		9		Dwelling Unit	"A residence containing cooking, sleeping and sanitation facilities used to house the members of a household. Within the meaning of the General Plan, dwelling unit does not include a second dwelling as defined in the Sonoma County Code Section 26-10, nor to Farmworker and Farm Family Housing."	The second paragraph is confusing. Please clarify and add: "See Accessory dwelling unit and Farmworker housing".

		10		<p>Environmentally Sensitive Habitat Areas</p>	<p>As a result of climate change, there are now much larger areas of sensitive plants, animals, and habitats in the Sonoma County Coastal Zone and areas affecting the coastal zone. The changing temperatures are affecting plants and animals demonstrating how sensitive many of the plants and animals are. These changes threaten the crucial role these features and species play in the complex, interconnected, and symbiotic relationships in the coastal zone. ESHA Maps 1-11 The Maps decline to map many areas saying the data is not accurate or is vague. The areas that are mapped are tiny. The maps do not give any known information with respect to candidate, sensitive, or listed species plant or animal. These maps do not anticipate climate change and changing habitat and setbacks that will be required. All this despite many scientific studies available, years of work by agencies on major recovery plans, and our new LiDar capabilities. These are critically important to preserve the open spaces and species with few adequate places to roam, migrate, forage, reproduce, and thrive. See also: Open Space Resource Conservation. Figure-C-OSRC-2-Environmentally-Sensitive-Habitat-Map-Series-4. pdf Must include threatened species. The author should consider adding floodplain habitat to this list of ESHAs. Significant floodplain habitat and function has been lost in Sonoma County, and throughout California. Floodplains perform a number of critical ecological processes.</p>	<p>Add floodplain habitat to this list of ESHAs. All species that currently or who have historically existed in the coastal zone - and their habitats and buffer areas, must be identified and their spatial needs substantially enlarged and mapped taking into full consideration the worst possible scenarios science predicts for them as a result of climate change and related impacts. Expand definition to include the "recovery" areas already designated for listed species, the historic and potential habitat of sensitive, candidate, and listed species. Recovery plans that are in progress, being implemented, and past plans must be protected in order to be successful in the short and long term. And include the areas outside the coastal zone that might be altered resulting in harm to species that use the coastal zone for some part of their life or diet. Corridors, foraging, and sheltering are necessary and need to be generous to fully protect species that need to use the coastal areas and open spaces more than ever. Add the word "threatened" to criterion (1). Also add: "In addition to current criteria, ESHAs shall be expanded to include buffer zones and potential future ESHAs based on the effects of climate change and human population and development pressures." Reflect this updated criteria in accompanying ESHA maps.</p>

		10		Environmentally Suitable	by what standard?	Change to: "Having minimal or insignificant adverse impact on the environment, as defined by a scientific, impartial third party, such as NOAA's guidelines for coastal zone management.
		10		Erosion	"The loosening and transportation of rock and soil debris by wind, rain, or other running water or the gradual wearing away of the upper layers of the earth."	Insert: "...wind, rain, overgrazing, human activities, or other...."
		10		Farm Animal Production	"The raising, breeding, and maintaining of horses, donkeys, mules, and similar livestock and farm animals."	Change to "All forms of animal husbandry and livestock production".
		10		Farm Retail Sales	This restricts small farms inappropriately to a greater extent than winery operations. Can the "operator" own or lease other properties not in the area, the county, the region - and qualify?	Food & Fiber operations
		11		Farmland of Local Importance	This definition is capricious and inappropriately discretionary.	Omit this glossary item.
		11		Feasible	"That which is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal and technological factors."	Add: "Feasibility is a judgement call based on resources and influence and a matter of potential public debate."
		11		Fill	"Earth or any other substance or material, including pilings placed for the purposes of erecting structures thereon, placed in a submerged area."	Insert: ".....in a submerged or subsided or lower-lying area"
		12 - 13		Guest Quarters and Hosted Rental	Definitions are opposing.	Under Guest Quarters, a stand-alone dwelling may be considered a hosted rental. Under Hosted Rental, only a single room within an owner's home is permitted. Please clarify.
		13		Incidental Sales	How are "Incidental Sales" quantified and/or qualified? By what metric is it determined that the sales do not change the primary use? "incidental sales of merchandise or goods not produced on site is limited to 10% of the floor area up to a maximum of 50 s/f" Is "primary use" determined by acreage of tillage, acres of land, economic percentage or something else? Please clarify. The limitation of s/f by percentage is stricter than most (year round) winery sales ... why?	define "incidental" and to what is it incidental? Year round sales for food &/or fiber should not be more restrictive than all other ag products, unless impacts are greater - and must be defined in what way they are greater.



		13		Indicators	"Quantifiable parameters and representative measurements of demographic, economic, social, environmental, and other conditions related to the quality of life and the effectiveness of General Plan goals, objectives, and policies."	Remove the General Plan as the reference for compliance. The LCP is to stand independent of the GP, due to its unique character.
		13		Junior Accessory Dwelling Unit		
				Level of Traffic Stress	(somewhat analogous to Level of Service) experienced by bicycle-borne roadway users. Level of Service (LOS) is relatively well understood and can be reasonably applied to the Coastal Zone. See Vehicle Miles Traveled (VMT) considerations later.	ADD definition
				Live/Work	consider changes in Live/Work Uses, impacts & mitigations, including Home Based Businesses and/or Home Occupations. COVID.19 is likely to change the way many people function from their homes in coming years. Needs and impacts will likely shift.	
		15		Mitigate	The definition of "Mitigate" should reference CEQA and clarify the necessary achievement of a goal. What determines the need to go from a Mitigated Negative Declaration to an Environmental Impact Report, and then to provide Findings that determine there are overriding beneficial circumstances? Clarify "avoid to the extent reasonably feasible", - as determined by whom or to what standard?	Drop the words "to the extent reasonably feasible". See comment on the word "feasible" above.
		16		Natural resource	Something (as a mineral, waterpower source, forest, or kind of animal) that occurs in nature.	Change to: "A naturally occurring substance, living entity or phenomenon that is of potential use to humans."
		16		Noise	"Unwanted sound produced by human activity that interferes with communication, work, rest, recreation, speech, and sleep."	... interferes with communication, work, rest, recreation, speech and or sleep or the wellbeing of the natural environment, including other animals, and meets the current required Noise/Land Use Compatibility Standards - to property boundary.
				Pedestrian Level of Service	(somewhat analogous to Level of Service) experienced by ambulatory roadway users	ADD definition

		16		Performance Standards	"Standards or criteria for regulating or determining the acceptability of certain land uses based upon the performance of the use."	Please define "performance". Does it mean profit? Activity?
		16		Permitted Use	"A typical land use that is allowed within a particular General Plan Land Use category. A permitted use is considered to be consistent with and to further the objectives of the General Plan. Such a use may also be subject to performance or other development standards and approvals in the zoning ordinance." Again, inappropriate referral to the General Plan is used.	Please amend to: "A land use allowed within the Local Coastal Plan Land Use category..... objectives of the Local Coastal Plan."
		16		Person	Is an LLC or other business association or corporation really a person? [A personal aside ... a "Person" should not be a corporation or an LLC. - you know the old saw "I'll believe a corporation is a person when Texas executes one." Okay ... enough of that]	This reference to corporate entities as persons is an source of environmental, economic and social degradation and as such, should be purged from the glossary.
		17		Primary or Predominant Use	<b>Define "prevailing" ...</b> "clearly define what is intended. Is this determined by percentage of parcel (if the parcel cannot be subdivided), or ratio of income, duration of use (by whom?) or some other quantifiable factor? SYNONYMS. current, existing, prevalent, usual, common, most usual, commonest, most frequent, general, mainstream. widespread, rife, in circulation. set, recognized, established, customary, acknowledged, accepted, ordinary."	
				Principally Permitted	As used in the Land Use Element, described as primary purpose of the land use category. In years to come, this could become a challenge to interpret.	
				Public Utility Facility	Please include "micro-grids" in definition of "Public Utility Facility". I expect as climate change impacts and increasing necessity for independent energy sources grow there will be more shared energy creation.	Add Micro-Grids to definition
		19		Riparian	This is not a strong definition.	To clarify, riparian has more to do with a location, specifically adjacent to a surface water body (e.g., streambank).

			Riparian Corridor	definition indicates the existence of vegetation. There will be instances where plants have been removed variously, and the riparian area will still exist, necessitating restoration of plants to support natural functions.	Do not limit definition to corridors with vegetation
		19	Riparian Functions	Thank you ... years in the making	
		20	Secondary Use	define "predominant"& "prevailing"	
		20	Sensitive Coastal Resource Areas	(f) Areas that provide existing coastal housing or recreational opportunities for low and moderate-income persons. Should clearly mean that vacation rentals cannot take away any middle to low-income housing	
		20	Single Event Noise Exposure Level	No level cited here; we need numbers. County said action that causes the noise but no metrics. Residents need that protection so it can be enforced	
			Special Treatment Area		amend the paragraph to read "... area of special scenic significance, OR any land where logging interests could adversely affect public recreation ...". Please consider updating maps to include greater areas of "bounded forested area within the coastal zone"
		22	Specimen Tree	Use definition from Law Insider	"Specimen tree means a tree that is particularly impressive or unusual example of a species due to its size, shape, age, or any other trait that epitomizes the character of the species as further described in the most recent version of the Trees Technical Manual."
		22	Stream	Should acknowledge beyond Blue Line Streams. How does this affect definition of ESHA that says - all perennial and intermittent "streams" and their tributaries? To be all inclusive, do not use the word stream here even if using it loosely - use the word drainages or watercourses of all kinds...or something more inclusive than the previously narrowly defined "stream".	

		22		Sustainable Yield		Add to end of statement: "nor compromise adjacent parcels' water availability."
		23		Transportation Demand Management (Federal Highway Administration) or Traffic Demand Management (Caltrans)		Programs and strategies that reduce congestion through reduction of demand, rather than increasing capacity or supply. The goal of TDM is to reduce the number of vehicles using highway facilities while providing a wide variety of mobility options for those who wish to travel. Examples of TDM are: (1) High occupancy vehicle lane (2) Alternative work hours (3) Ride sharing programs (4) Telecommuting (5) Land use policies that reduce distance between jobs and housing. <b>Add: (6)</b> Safe, secure and convenient facilities for cyclists pedestrians, and transit users provided by employers or the community.
		24		Vegetation Removal	Implies use of herbicides in the coastal zone	Address the issue of prohibiting pesticide use in the coastal zone prior to final wording of this entry.

		24		<p>Vehicle Miles Traveled</p> <p>the description relies on technology that may not be available in the coastal areas. Data for VMT on the Coast is said to be a bit fuzzy, due to the poor cell-phone coverage in the area. It will probably improve over the next several decades – by the time the next LCP update is due.</p> <p>Usually, home-based trips and work-based trips are combined to calculate VMT. In tourist areas it would be helpful to include venue-based trips (to and from a beach or wine-tasting room). The traffic on SR-1 is likely a LOS issue, and can be estimated using old-fashioned pneumatic traffic counters.</p> <p>Chained trips are also hard to assess (mom takes a child to daycare, then goes on to work, stops on the way home to get groceries, etc.) People coming to the Coast may drive from Fresno, spend the night in Sonoma, then drive to a Bodega Bay hotel with a stop for lunch in Sebastopol. Currently only the trip from Sebastopol to Bodega Bay would show up in Big Data as a trip to the Coast. If someone flies into our airport from Atlanta, and takes an Uber ride to Bodega Bay, Big Data might only catch the Uber trip, and might even ignore that, since the trip is neither home-based nor work-based. And without the Wi-Fi information, none of it may be easily tabulated.</p>	
		24		<p>Watershed</p> <p>Smaller bodies of water are becoming increasingly more important due to climate change.</p>	<p>The area of land that includes a particular river, lake, or creek and all the streams and springs that flow into it.</p>
		24		<p>Wetlands</p> <p>Why are the Bodega Bay Tidal Flats specifically excluded as wetlands?</p>	<p>Please include Tidal Flats</p>

Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Appendix A: Design Guidelines</b>						
1. Coastal Design Guidelines						
	1.1 Development				The entirety of Appendix A presumes coastal development which is, despite the specifics listed here, as yet opposed. Even if some form of development is approved, the wording of each section is inconsistent with the County's own climate change policy (earth-moving, building on grades up to 30%, "retaining" as many trees as possible, etc.) The appendix' language also contradicts policy listed in the OSRC Element.	
		1				

Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Appendix D: Scenic Resources</b>						
1. Scenic View Easements		1				
	Easements & Tree Removal Guidelines	1				
2. Scenic View Guidelines		5	5, 6, 2007	Scenic View Guidelines and Protection	As stated in the general comment given in Appendix A regarding development, the presumption of development valued over scenic views is opposed. The specific guidelines as stated are in conflict with the values of the CCA and with this document's OSRC Element, (eg, " <b>Minimize Visual Impacts</b> ". If compliance with these standards would make a parcel unbuildable, structures shall be sited where minimum visual impacts would result. (GP2020 / Existing LCP Revised)". This statement reflects the intent to develop the coastal zone at any cost.	

Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
Appendix E: Natural Resources						



1. Restoration & Monitoring Requirements

1

• Consistent with the California Environmental Quality and Coastal Acts, any proposed projects must demonstrate a compelling need (financial gain at expense of lost habitat shall be insufficient for this purpose) and must demonstrate that avoidance of impacts (the essential first mitigation option listed in the CEQA Guidelines) is impossible, in which case the proposal should be re-evaluated with respect to its "compelling" need.

• Independent arbitration and review of permit applications proposing any loss of intact land, water, soil, or vegetation surface shall be conducted; such review shall be by a committee or panel comprised of an equitably represented cross-section of scientists, residents, concerned citizens, and regulatory agencies.

• Requirement for a Restoration and Monitoring Plan should be applied to all new and ongoing projects, including current or proposed agricultural uses, including and not limited to grazing, wine grape production, cannabis cultivation, timber extraction, introduction of exotic plants or animals, tilling, water impoundments or diversions, drilling for any purpose (including new water wells), or development of any kind (e.g., housing,

Key Components

o (k) Weed eradication plans shall specify specific methods and techniques to be implemented for each species proposed for eradication; use of synthetic chemicals or biocides of any type shall be of lowest management priority, and must be specified prior to plan implementation and subject to scientific, regulatory, public review;

o (l) Planting Plans shall prioritize both geography and ecology for the purpose of introducing propagules, that is, local seed and plant sources shall be used or enhanced (e.g., through removal of invasive plants), and a propagule acquisition plan accompany the planting plan for the purpose of specifying "as local as possible" sources for seeds, cuttings, divisions, or entire plants; the use of any ecologically non-native plants shall be accorded minimal priority, and these must be demonstrated to have no potential for deleterious ecological impacts (invasiveness, toxic to wildlife, directly competitive with native plants, etc.) – the concept of "non-native" shall be operative in a strict sense, such that proposed plant introductions must be consistent with local ecological conditions and floristic composition (for example, introduction of plants native to California (such as bush anemone, Matilja poppy, cacti, palms) but not native to the Sonoma County coastal region shall be considered "non-native").

o (m) Irrigation Plans shall avoid introduction of plastics, metals, or other foreign materials or substances into areas proposed for mitigation or rehabilitation, other than as temporarily necessary to reduce herbivory (e.g., gopher or deer-resistant enclosures); in all circumstances, selection of ecologically and climatically appropriate plant species for the site shall be accorded high priority, i.e. plant species evolved within extant ecosystems and climatic conditions that have reduced requirements for dry season watering shall be prioritized.

o Add "key components":

(p) Plans and mitigation actions shall be proposed and implemented for a period of no less than 10 years, or until such time that independent review has established "success" to include a measure of "resiliency," or the relative ability of the mitigated area to retain ecological functions and species composition without human intervention; failure to achieve "resiliency" shall require the County of Sonoma and the California Coastal Commission to document such failure, for future reference with regard to permitting and mitigation requirements, and to initiate renewed rehabilitation of the site, with fees or penalties to fund such work at the discretion of the County or the Coastal Commission.

(q) As a component of permitting for ecologically impactful project proposals and subsequent implementation of mitigation or ecological rehabilitation plans, the County or the Coastal Commission shall provide for a public education program, including site tours, field courses on local ecology and habitat rehabilitation, and volunteer participation in mitigation or rehabilitation work, including plant propagule collections and planting, site maintenance, and data compilation, under the guidance and direction of the restoration manager or others hired specifically to fulfill education and volunteer coordination roles.

2. Biological Resource Assessment Requirements		3			<ul style="list-style-type: none"> <li>• All project proposals, in order to be consistent with Policy C-OSRC-5b(3), shall require completion of a complete biotic inventory for all primary organismal groups: plants, animals, and fungi (e.g., vascular and nonvascular plants, birds, reptiles, mammals, amphibians, insects, lichens, mushrooms); see <a href="https://wildlife.ca.gov/Conservation/Survey-Protocols">https://wildlife.ca.gov/Conservation/Survey-Protocols</a>.</li> <li>• With the participation of local indigenous cultural representatives, species and habitats of significant cultural value shall be accorded recognition and conservation consistent with that accorded currently listed sensitive or rare species of plants or animals, and the Sonoma County PRMD and the California Coastal Commission shall maintain an inventory of site-specific plant lists and other data and references of these plants and habitats of significant cultural value.</li> <li>• Plant inventories and sensitive species surveys shall be conducted strictly in accordance with the California Native Plant Society "Field Protocols and Guidelines" <a href="https://cnps.org/wp-content/uploads/2018/03/cnps_survey_guidelines.pdf">https://cnps.org/wp-content/uploads/2018/03/cnps_survey_guidelines.pdf</a> and the California Department of Fish and Wildlife "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" <a href="https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&amp;inline">https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&amp;inline</a>.</li> <li>• Annually multiple (no less than 2), seasonally appropriate plant surveys shall be required for all proposed project sites; discard allowances for "constraints" on accuracy or comprehensive nature of surveys – require a waiting period for permits sufficient for the completion of comprehensive, protocol-consistent biotic surveys for all projects.</li> <li>• All accrued data from surveys shall be provided to appropriate regulatory agencies, and rare plant data submitted to the California Natural Diversity Database according to DFW and CNPS protocols.</li> <li>• Sonoma County PRMD shall retain the services of no less than five (5) biologists for the specific purpose of peer review: assessing the results of biotic surveys for project with the potential to affect intact ecosystems or wildlife habitat. These biologists shall include, at minimum one biologist, two additional scientists (from physical or earth sciences), one archaeologist, anthropologist, or cultural historian, one indigenous tribal representative each who specialize in 1) plant life and vegetation (e.g., botany, plant ecology), 2) wildlife species and habitats (e.g., wildlife biology, zoology), 3) geomorphology and hydrology, 4) geology and soils (including soil or fungal ecology), or 5) indigenous cultural and historical habitat management.</li> </ul>
3. Criteria for Establishing Buffer Areas		5			
4. Technical Criteria for Identifying & mapping wetlands & other Wet Environmentally Sensitive Habitat Areas		8		4.3 Wetlands/Riparian Area Distinction	<ul style="list-style-type: none"> <li>• Resolve "difficulty" of distinguishing wetland types (riparian, marsh, et al.) from one another, and specify inclusion in [append] Section 30121 of the California Coastal Act, with provision for consideration of all sites of nominal dimension (e.g., &gt;10 m<sup>2</sup>) that support currently specified wetland plant species as jurisdictional or regulated wetlands, seasonal hydrology, or hydric soils, thus including upland "seeps, springs, sag ponds, or other headwaters or waters flowing into downslope riparian zones" or contiguous with "subterranean aquifers."</li> <li>• Such upland wetland types are abundant within the Sonoma County coastal zone, and as sources of downstream surface and subsurface water, as well as on-site or downslope plant and wildlife habitat, they should be accorded similar protection with regard to establishment of ESHAs.</li> </ul>
				4.4 Vernal Pools	<ul style="list-style-type: none"> <li>• Unless substantiated information can be provided to the contrary, vernal pools do not exist within the Sonoma County coastal zone, and removal of this section from the draft LCP seems reasonable.</li> <li>• Sag ponds, springs, seeps, and other upland water bodies and wetlands should be added (as noted above in 4.3), with representative plants for these types appended, as noted below in 4.5.</li> </ul>

				4.5 Representative Plant Species in Wetlands & Riparian Habitat Areas	<ul style="list-style-type: none"> <li>• Review and revise all wetland and riparian type “representative” plant lists for greater inclusivity, as well as specificity for documented plant species occurrence in the Sonoma County coastal zone – the existing lists are incomplete, and include species not documented from the Sonoma coast.</li> <li>• Correct and revise to current nomenclature all lists of plant, animal, and other organismal species, and correct misspellings.</li> <li>• Strike E. Vernal Pools from these lists, as noted above for Section 4.4 (but not necessarily all the vernal pool species, as some occur in other wetland types in the Sonoma County coastal zone and can be re-assigned to the lists for those types).</li> </ul>
5. Habitat Protection Guidelines		16			<ul style="list-style-type: none"> <li>• All habitat protection guidelines and subsequent applications of these guidelines shall be reviewed, assessed, and re-constructed through the appointment of an independent citizens’ panel to include scientists, regulatory agencies, and private citizens and Sonoma County residents.</li> <li>• The findings of this (and other such appointed independent panels or commissions) shall be made and retained as publicly available documents, and subject to ongoing review and revision, and subject to approval of the Sonoma County Board of Supervisors.</li> </ul>
				5.1 Streamside Conservation Area or Riparian Corridor	<ul style="list-style-type: none"> <li>• Timber Harvest: All timber harvest plans, commercial (THP), or Non-Industrial timber management plans (NTMP), proposed for sites wholly or partially within the Sonoma County coastal zone, shall be under the jurisdiction of the Sonoma County PRMD and the Sonoma County Board of Supervisors, subject to a program of public disclosure and review.</li> <li>• Similar constraints and provisions shall be applied for all listed (or other pertinent circumstances) “allowable uses and development” within riparian zones that propose any alterations to vegetation, individual plants, wildlife habitat, stream channels (including impoundments, diversions, points of public access, or fill of any type; all such proposed impacts or alterations shall be disclosed publicly and subject to permitting requirements.</li> <li>• Agricultural Activities: The County PRMD shall append stated provisions under this section to include requirement for mitigation and monitoring of any agricultural or related activities, to include but not limited to grazing, forage or feed introductions, crop production, grading, soil tillage, introduction of ecologically non-native plant materials, fill materials (e.g., gravel), construction of roads or bridges, et al. Such provisions are essential in order to protect or enhance downslope water quality and plant and animal habitat, to reduce erosion potential – past and current agricultural activities in the Sonoma County coastal zone have, in part, resulted in severely compromised ecosystems, affecting species composition, rare plant and animal populations, soil health and stability, water quality, and other facets of ecological function.</li> </ul>

Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Appendix I: Categorical Exclusions</b>						
1. Categorical Exclusion Conditions for Units 1, 2 and 3 in Bodega Harbour		1	1, 2, 2003		<p>No maps are included in the draft, so it is almost impossible to know what areas are covered by this section. ALL of the APN's listed for Bodega Bay are in hazardous zones, especially as to geologic conditions and flooding from ocean rise. Most of the information contained in this Appendix is incorrect as to locations. There are no Units 1, 2 and 3 in Bodega Harbour and some of the AP's listed are in Harbor View. HV is one of the most sensitive geological areas in Bodega Bay as it is not only in the Alquist Priolo Zone, it is on a main fault of the San Andreas. 58 landmark cypress trees and numerous eucalyptus trees, all of which once supported habitat for herons, raptors, owls, bats and other inhabitants.</p>	<p>Please add maps, include hazard zones and correct APNs. Require traffic impact analysis and mitigations. Review hazard analysis and mitigations. Require tree ordinance to retain scenic views and soil stabilization. Require studies of ESHA areas, migration corridors, habitat areas for permanent protection.</p>

<p>2. Categorical Exclusion for Taylor Tract and First Addition, Bodega Bay</p>		<p>4</p>			<p>Few if any properties are available for building and no one in Bodega Bay seems to know where "First Addition" is</p>	
		<p>4</p>		<p>2.1 "B-2"</p>	<p>"B-2" for "Villa Marina" is another unknown location. It may refer to the Porto Bodega area on Eastshore Road which is not only on the San Andreas, it is in a flood zone as is West Whaleship Area.</p>	<p>Please provide maps</p>



August 25, 2021

Via E-Mail and USPS

[Tennis.wick@sonoma-county.org](mailto:Tennis.wick@sonoma-county.org)

Tennis Wick, Director  
Permit Sonoma  
2550 Ventura Ave.  
Santa Rosa, CA 95403

Copy to: Gary Helfrich (Project Planner, Permit Sonoma) [Gary.Helfrich@sonoma-county.org](mailto:Gary.Helfrich@sonoma-county.org),  
Lynda Hopkins (Sonoma County Supervisor, Fifth District) [Lynda.hopkins@sonoma-county.org](mailto:Lynda.hopkins@sonoma-county.org),  
Stephanie Rexing (California Coastal Commission) [Stephanie.rexing@coastal.ca.gov](mailto:Stephanie.rexing@coastal.ca.gov)

RE: Coastal Zoning Updates and Local Coastal Plan / Policy Phase

Dear Mr. Wick,

Thank you for the opportunity to provide continued input to the County's ongoing process to update its Local Coastal Plan ("LCP"). The Bodega Harbour Homeowners' Association ("BHHA") has previously submitted extensive public comment on the LCP in a letter dated March 23, 2021. After reviewing the June update of the LCP draft, we are pleased to find that many of the recommendations have been incorporated in the June LCP draft, and we urge for the adoption of any remaining BHHA comments into the LCP draft.

However, we find that some particularly important aspects that relate to the specific history and regulatory settings of the Bodega Harbour Homeowners' Association ("BHHA") that we have requested for consideration have not been adopted in the latest LCP draft. As explained in the statement below, the regulatory history of the Bodega Harbour development is unusual and of lasting consequence. The LCP should recognize this history by incorporating the following statement in the document:

**"Bodega Harbour is a Planned Unit Development approved by Sonoma County in 1974. Two years later the California Coastal Act was adopted. Litigation addressing the applicability of the Coast Act to Bodega Harbour was settled through a Settlement Agreement binding Bodega Harbour and the Coastal Commission and memorialized in a recorded 1977 Stipulated Judgement. The Settlement Significantly downsized the previously approved plan and imposed restrictions governing height, massing, lot coverage, grading, and design. The Settlement expressly prohibited detached structures on residential lots, imposed greater open space dedications, and identified specific public access easements for required coastal access. The Settlement expressly stated the Agreement 'shall inure to the benefit of and be binding**

**upon the parties ...(and)... their successors and assigns,' and thus remains binding on Bodega Harbour and the Coastal Commission."**

We thank you and your department very much for your hard work and efforts to date and look forward to working with you, your staff and the County's appointed and elected officials as the LCP and zoning update proceeds from the "Policy Phase" to later formation and implementation phases.

Sincerely,



Jennie Alexich  
President, BHHA

## Comments on County of Sonoma LCP Draft – LAND USE POLICY, Bodega Bay

Enhancement of tourism and recreation is no longer feasible to the extent called for.

3.2 Policies listed for Bodega Bay are not compatible with the true needs for Bodega Bay. The real truth is that Bodega Bay cannot continue to grow under any of the policies outlined in the LCP Draft.

There is only one road to and through Bodega Bay, State Hwy. 1. This 2-lane road not only serves Bodega Bay, it serves as the gateway to the North Coast and traffic constraints have already reached persistent gridlock for the community and for those seeking recreation from the beaches to the north. The need for low income housing for its residents and those working in the fishing and hotel industries cannot be overstated. Houses are priced out of the range of most of those wishing to live and/or work in the area. Long-term rental housing no longer exists to the extent needed and those who seek work in the existing industries must now commute to neighboring cities putting more and more stress on the existing traffic constraints.

The most egregious problem Bodega Bay faces is the proliferation of the vacation rental industry, fueled by the County's want and need for tax and permitting money generated in the area. The best example of this is Harbor View Development. The County is still allowing the developer to build up to 70 houses to be used for vacation rentals. This development is wholly owned and operated by the developer to the detriment of the people of Bodega Bay and Sonoma County, and the environmental impacts that have taken place over the past 20+ years have far exceeded any and all of the provisions of the Coastal Act and LCP.



- 2 -

**3.2.2 Background.** Information contained in this section is for the most part erroneous. The population figures used do not compute with reality, Harbor View Subdivision was not completed in 2005. Only the affordable units, Harbor View Village, have been completed. The water supply information is completely inaccurate as to existing and future water supply and facilities and does not take into effect the future rise of sea level and climate change. Traffic already far exceeds allowable numbers and will only get much worse with any planned development.

There are far too many revisions needed in the entire document and it will take a village of biologists, geologists, scholars, locals and other knowledgeable people to come up with an LCP that speaks to its real purpose. The present draft is only a plan for future growth and does little to preserve our coast.

Something must also be done with regard to enforcement of the rules and regulations contained in the Coastal Act and the LCP. The County has allowed for the provisions to be improperly amended for most if not all of the projects approved along the Sonoma Coast and its actions have proved detrimental to preserving the Coast. Public hearings, proper EIRs, adherence to codes, regulations and conditions of approval, etc. have become things of the past. Proper procedure must be restored.

**From:** [Niall Browne](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Subject:** <https://www.thesearanchhostingcoalition.org>  
**Date:** Monday, July 26, 2021 5:04:16 PM

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**EXTERNAL**

Hello,

As per this petition I object to these unnecessary proposed changes being made regarding Sea Ranch short term rentals.

Thanks,  
Niall

" 2. **We strongly oppose** restrictions on whether and when owners may rent their properties as proposed by The Sea Ranch Association (TSRA) Board in their "Model Rule 6.7" ([here](#), page 4a8). These restrictions include limits on the number of days a home can be rented, a reduction in the total number of rental homes and a minimum of 300ft between any two rental properties. "

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**From:** [Elise Weiland](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Fw: Why we need the LCP onshore facilities ordinance updated for offshore wind  
**Date:** Sunday, September 26, 2021 12:32:30 PM

---

Passing this public comment onto you.

Happy Sunday!  
Elise

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**From:** Richard Charter <waterway@monitor.net>  
**Sent:** Friday, September 24, 2021 4:43 PM  
**To:** Lynda Hopkins; Elise Weiland; Leo Chyi  
**Subject:** Why we need the LCP onshore facilities ordinance updated for offshore wind

**EXTERNAL**

Dear Lynda:

Because it's the same oil companies that wanted to do offshore drilling here:

“Two of the world’s largest oil and gas companies, along with several other energy companies, have expressed interest in pursuing a lease to develop an offshore wind energy farm off the Central Coast. A subsidiary of Royal Dutch Shell — Shell Renewables and Energy Solutions LLC — and bp America Inc. both wrote to the U.S. Bureau of Ocean Energy Management (BOEM) to express eagerness about the proposed floating offshore wind farm in the Morro Bay call area west of Cambria and San Simeon.”

[https://www.sanluisobispo.com/news/local/environment/article254426613.html?fbclid=IwAR1tTA-bgcPUoKmmYR1fXOjX6WMrQyaZcEzO1-YuIcCQcKvZT\\_0SF7rCZfs](https://www.sanluisobispo.com/news/local/environment/article254426613.html?fbclid=IwAR1tTA-bgcPUoKmmYR1fXOjX6WMrQyaZcEzO1-YuIcCQcKvZT_0SF7rCZfs)

This also applies to the Humboldt offshore wind lease area to our north....which would almost certainly eventually route a subsea cable south...

Richard Charter

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**From:** [Megan Cole](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** TSRA Board Model Rule 6.7  
**Date:** Thursday, July 22, 2021 6:59:49 PM

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**EXTERNAL**

Hello Sonoma County Planning Department,

My grandparents built our home at the Sea Ranch back in the 1980s after having held the land since the 1960s. So our Sea Ranch home is a very special place for us. I am writing to ask you to please **reject** the The Sea Ranch Association (TSRA) Board Model Rule 6.7 regarding restrictions on whether and when owners may rent their properties.

The ability to rent a Sea Ranch home should be the owners choice. Its prohibition requires a clear justification, which has not has been provided: TSRA has not done any studies, engaged any consultants or expressed no opinion on the effects of the proposed restrictions. This is completely irresponsible and so unfair. Especially to those of us who have been honest and responsible contributors to the Sea Ranch community for over 50 years now!

Please **reject** the The Sea Ranch Association (TSRA) Board Model Rule 6.7 regarding restrictions on whether and when owners may rent their properties and do not delegate the creation of performance standards and/or restrictions to the TSRA Board.

Thank you for your consideration.

Megan M. Cole

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**do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [Cindy Culcasi](#)  
**To:** [Eric Koenigshofer](#)  
**Cc:** [Cecily Condon](#); [Gary Helfrich](#)  
**Subject:** LCP - Fire Abatement/Fuel Management Process  
**Date:** Monday, September 20, 2021 3:15:59 PM

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**EXTERNAL**

Dear Commissioner Koenigshofer,

I am following up regarding your comments in the July and August Coast MAC Meetings. Thank you for patiently listening to everyone. My comments are specific to developing a program that would make an exception for residents being required to obtain a Coastal Permit while performing fire abatement/fuel management. Not only is it costly to obtain a permit, but even more so if an arborist or CEQA is required. This requirement also can delay the process for a number of months. This is not only frustrating since a resident may miss the burning permit season, but the cost could be prohibitive for many residents.

My husband and I work every year to perform fire abatement around our home. In fact, we recently asked Fire Safe Sonoma to come out and give us pointers. We received a glowing report and also were given some additional instructions to further make our home more fire safe, e.g., install special screening under our decks and also to the vents around our home which would stop embers from floating under our home and decks. We happily implemented the suggestions.

We were pleased to hear that the LCP would include a program for fire abatement/fuel management that would not require a permit as long as the Cal Fire/Permit Sonoma criteria was met for fire abatement. In Timber Cove, our Board for many years (approx. 50), has worked with our members regarding cutting trees and annual fire abatement. If a member wanted to cut redwoods, they would be referred to Permit Sonoma to obtain the proper approval. We are focused on fire abatement. Generally, the trees cut are dead, dying, or leaning over a home, road, or driveway. Much of the work is cleaning out brush, and branches and trees that have fallen. This process has worked well over the years.

Now I have recently heard from a neighbor that the LCP fuel management process would still require a permit. I hope this information is incorrect. Consistent fire abatement is so important and could save a resident or first responder's life in some instances. Why make it so difficult and costly to clean and maintain a defensible area around a home? Empty lots also need to be taken under consideration when it comes to fire abatement.

We are hoping that a reasonable solution will be implemented in the LCP. Certainly, our Timber Cove Board could work with Cal Fire and the County to implement a reasonable,

minimal cost (if any), timely process for our community that will keep our homes fire hardened and the area in general as fire safe as possible.

I have cc'd Cecily Condon and Gary Helfrich since they are familiar with our concerns.

Thank you,  
Cindy & Sal Culcasi  
22087 Gordon Ct  
Jenner

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**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

**From:** [John Dick](#)  
**To:** [PRMD-LCP-Update](#)  
**Cc:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#)  
**Subject:** Sonoma Planning Committee Meeting on Short Term Rental-July 26, 2021 Input and Comments  
**Date:** Friday, July 23, 2021 11:50:39 AM  
**Attachments:** [6c46b9\\_efdd0c3802cf4d69b60efd1aee353a6c.pdf](#)

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## EXTERNAL

I understand and sympathize with the general intent of the Sonoma County Short Term Rental Planning Committee Taskforce, and generally support the introduction of reasonable performance standards determining how Short Term Rentals are operated as proposed in the revised Local Coastal Plan. I oppose restrictions on whether and when owners may rent their properties, as proposed by The Sea Ranch Association (TSRA) Board in their "Model Rule 6.7".

As personal background, we are Sea Ranch property owners, my family currently spends about 20%- 40% of our time at Sea Ranch, and love it there. Our daughter and grandkids have grown up there. We have been renting out our property as a vacation rental, for over 20 years through local agencies some of which use the internet for advertising and booking. To my knowledge, and following up with our neighbors, there have been no complaints or problems. Renting our property has given us the ability to subsidize a home and achieve and share coastal access which in our early years would have been unaffordable.

I appreciate the effort the Sea Ranch Board of Directors have put into the Sea Ranch "Model Rule 6.7" input to Sonoma County. In the beginning, I was impressed with the thoroughness, intent, practicality and pragmatism with which the The Sea Ranch Short Term Rental Task Force (STRTF) first started. But last minute unsupported additions to the input related to quotas and density restrictions have destroyed the original equanimity they experienced.

The Sea Ranch is not a residential community. 69% of the houses are second homes, and approximately 20% of houses are used as short term rentals. The ability to rent a Sea Ranch home is a valuable asset. Its prohibition or restriction is a serious breach of personal property rights, counter to Sea Ranch CC&Rs intent, and should require clear justification. None has been suggested.

Proposed restrictions by TSRA Board members in their "Model Rule 6.7" submitted to Sonoma County include a cap on the total number of STR properties at The Sea Ranch, a maximum of 180 days each year that a home can be rented, and a minimum distance of 300 ft between STR properties. These density and quota restrictions were added at the last minute by the Board without further evidence, without study of the consequences, without substantive member consultation and in the face of strong opposition from members. Unfortunately, I can only believe that owners with rentals are either pale with fear, or red with anger. I believe the current input as proposed by a minority of residents, at the last possible minute, reflects a

hidden intent to ban rentals and restrict coastal access through density and quota limits.

Ability to rent your property has been historically an approved and accepted part of TSR ownership, and in some cases the only way owners could afford their homes. They make up about 20% of the membership, and are going to be severely discriminated against by a small minority of vocal and politically influential number of Sea Ranchers.

I have attached a copy of “ The Sea Ranch Hosting Coalition Submission to Sonoma County Local Coastal Plan July 26 2021” which I support, and includes many references contained in my input.

I appreciate the Sonoma County Planning Commissions taking the time to review this.

John Dick

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**From:** [Cindy Eggen](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** C. C. T. and equestrian dune trail B. B.  
**Date:** Monday, July 26, 2021 12:36:11 PM

---

EXTERNAL

Dear Gary

How will the new plan / trail effect the equestrian bodega bay dune trail and parking lot ?

Please preserve the existing equestrian dune trail . Please keep bicycles and equations separate for the safely of horse and their rider.

Sincerely Cindy Eggen

Sent from my iPad

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**From:** [Cari Cadwell](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Subject:** The Sea Ranch Association and its involvement in rental properties at the Sea Ranch  
**Date:** Wednesday, July 21, 2021 1:51:54 PM

---

**EXTERNAL**

To whom it may concern,

I am a home owner up at the Sea Ranch on the Sonoma County Coast. It has come to my attention that the Sea Ranch Association now wants to regulate when we can rent our homes, the amount of days we can rent our homes as well as the distance between two rental properties.

This is not acceptable. This is asking home owners to non voluntarily promote Segregated Housing! It is against the law in California.

The definition of Segrated housing is

Housing segregation refers to **the discriminatory treatment practiced on African American or other minority groups** in U.S. It is the practice of denying equal access to housing or available units through the process of misinformation, denial of realty and financing services, and racial steering.

The Sea Ranch Association is not acting appropriately. This puts the homeowner at risk once the home owners allotted rental days have been met. Being a Sea Ranch home owner I am not going to refuse any group of people from renting my home just because a Association has declared that I have used up my allotted rental days for the year. This is asking the home owner to discriminate denying equal access to housing or available units.

Please shut down this ludicrous idea of monitoring rental properties from the seat of a Association. This current Association has far over stepped their boundaries and it is time to stop all this craziness. People from all walks of life need to be able to enjoy the Sea Ranch not just the owners who own property. All people need to have access to available rental units. Access needs to be 360 days a year.

Common sense and using ones wisdom surly shows that having the Sea Ranch Association involved in any way with homeowners renting their properties is not a good idea. They are not in the rental property business and have clearly shown that what they are proposing is not well thought out.

I am not interested in breaking the law regarding fair housing or equal access to available units on the Sea Ranch for a Association who wants to have home owners discriminate on their behalf.

Cari Faso  
150 White Fir Wood

Sea Ranch Ca  
510-410-0517

PS Currently the Sea Ranch does not have enough rental properties available for short term rentals. Sizing down on short term rentals is also a poor call by the Sea Ranch Association. Again everyone should be able to enjoy the Northern Coast and that includes Sea Ranch.

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**From:** [no-reply@sonoma-county.org](mailto:no-reply@sonoma-county.org)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Local Coastal Plan Update: PF: Table C-PF-1. Characteristics of Public Water Systems  
**Date:** Friday, July 30, 2021 4:23:07 PM

---

Sent To: County of Sonoma  
Topic: Local Coastal Plan Update  
Subject: PF: Table C-PF-1. Characteristics of Public Water Systems  
Message: Bridgehaven Trailer Park Water System is Residential use, not Recreation.

Sender's Name: Kate Fenton  
Sender's Email: [kafenton@sonic.net](mailto:kafenton@sonic.net)  
Sender's Home Phone: 7078652469  
Sender's Cell Phone: 7075367154  
Sender's Address:  
PO Box 86 29001 Willow Creek Rd.  
Jenner, CA 95450

**From:** [Cathy FitzGerald](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Short term rentals Sea Ranch  
**Date:** Monday, July 19, 2021 4:16:12 PM

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COMMENT 56

## **EXTERNAL**

The Association's task force was biased and obvious. Many of us have owned homes at the ranch for many years (for us 18), had our homes on a rental market (Sea Ranch Escape) when we were not there. Yes, currently there are some issues. These can be addressed individually. This blanket approach to making part time residents, who by law have the same rights full time residents do, is divisive and unnecessary. Our CC&Rs are the same. Our deed restrictions are the same. We live there to hold dear that we tread lightly on the land and hope our offspring get to enjoy the same special place we have today.

Cathy FitzGerald  
21/64

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**From:** [Chelsea Holup](#) on behalf of [PlanningAgency](#)  
**To:** [Gary Helfrich](#)  
**Subject:** FW: Comments re: LCP 7/26  
**Date:** Monday, July 26, 2021 4:24:32 PM

---

**From:** Eric Fraser <truthintourism@gmail.com>  
**Sent:** July 26, 2021 4:13 PM  
**To:** PRMD-LCP-Update <PRMD-LCP-Update@sonoma-county.org>; PlanningAgency <PlanningAgency@sonoma-county.org>  
**Subject:** Comments re: LCP 7/26

## EXTERNAL

Hello Commissioners;

Thank you for the opportunity to participate.

Here is a summary of my remarks:

1) Public outreach should be more robust. Property owners, subject matter experts, residents, and visitors are being excluded because the outreach plan is poorly executed, dates are cancelled, this has been a long convoluted process. Staff claims robust public participation from what are the dozens of people who have participated over the years.

2) CCC, Permit Sonoma, BOS should consider the Lower Russian River as an extension of protections for visitors and the environment mandated under the Coastal Act.

3) Staff presents a bias against STRs by using misleading information, not bringing information supportive of STRs information forward, and by using misleading terminology.

-Gary claims that there is no way to "track vacation rentals" on the coast, however taxes are collected through the two leading booking platforms (Airbnb and VRBO) and also through professional management companies. During the recent "Vacation Rental Workshop with the BOS, they used statistics to paint the picture of the number of "vacation rentals"/STRs as excessive or problematic on the coast and by over inflating the number of "active" STRs inland (e.g. STR permitted properties that have hosted guests over the past year), the number of violations issued inland (and on the coast), the resolution of complaints, the handling of complaints created by their "web scraping" program, and many more issues.

-They refer to STRs as a "business", when they are permitted use of residential property. The data suggests that virtually all STRs lodge guests for less than 180 days in the aggregate in a year.

- They refer to "neighborhood character" without defining what that actually is.

4) Performance standards should apply not only to STRs but all properties.

## COMMENT 57

- 5) The presentation ignored the inter-relationship with adjacent counties.
- 6) The staff mis-represented the issues with the TSR "new rules", in that they were not ratified by membership, and not applicable to the discussion. This appeared to be a way to reiterate staff's ideology that STRs create negative impacts in TSR and by inference in other areas that resulted in HOA regulations. We see this a ploy to reinforce the ideology that STRs are a business requiring a "business license", or have unmitigated impacts.
- 7) Misrepresents the housing stock on the coast (and inland) and introduces an ideology of converting second or vacation homes into workforce or affordable housing. Avoids information that shows regulation increases the inefficiency of built residential inventory to house people for short term, and usage beyond 30 days. More regulation means more empty bedrooms and homes!
- 8) Leaves out of the discussion (and won't release to the public) information about how STRs accomodated families evaluated during emergencies, house first responders, and for adaptive use other than use as "vacation rentals" during emergencies...
- 9) Did not adequately consider ADUs in the presentation.

Eric Fraser  
Truth in Tourism  
707.479-8247

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**From:** [Margaret Grahame](#)  
**To:** [Gary Helfrich](#)  
**Cc:** [Cecily Condon](#); [Leo Chyi](#)  
**Subject:** Pipeline Provision in LCP Update  
**Date:** Tuesday, August 17, 2021 10:59:23 AM  
**Attachments:** [image002.png](#)  
[image004.png](#)

COMMENT 58

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**EXTERNAL**

Hi Gary,

I am writing to request a Pipeline Provision Recommendation by Permit Sonoma staff be included in the Local Coastal Plan update currently in process and presented to the Board of Supervisors accordingly, prior to final certification by the California Coastal Commission.

Of course, please feel free to contact me if you have any questions.

Many thanks,

Margaret Grahame  
Project Manager  
[Timber Cove Resort](#) | [Coast Kitchen](#)  
21780 Highway 1, Jenner, CA 95450  
Hotel: 707-847-3231  
Cell: 831-667-2757



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## COMMENT 59

July 20<sup>th</sup>, 2021

Sonoma County Planning Commission Members,

I write to you today as the grandchild of one of the original homeowners at The Sea Ranch. My grandmother and grandfather had a home built on a beautiful piece of Sonoma County coast in 1969 when all that surrounded their selected lot were incredible open fields and expansive ocean views. They (and ultimately just my grandmother) were proud home owners at The Sea Ranch for over 50 years until my grandmother's passing in 2020 at the age of 102. It gave her great joy to know that the younger generations of her family had come to love and cherish it as much as she did, and that she would pass on this special piece of our family history to the next generation.

I have been visiting the Sea Ranch my entire life (45 years), with increased frequency over the last 10 years since my daughter was born. We drive through Sonoma County (Penngrove, Petaluma, Valley Ford, Bodega Bay, Jenner, Guerneville, Stewarts Point) as many as a dozen times a year on our journey to what has become our second home. Our trips include stops at restaurants, wineries, gas stations and stores. Our love affair with Sonoma County started with The Sea Ranch but grew into a love of the entire Sonoma Coast and southern inland towns. We've spent many thousands of dollars in Sonoma County and brought countless friends to our family home over the years who have done the same.

Now, The Sea Ranch Association, is recommending to your Commission, provisions that will certainly guarantee that my family will be forced to sell my grandparent's home; the home they envisioned, built, cared for and loved for a half century – longer than just about any other home owner at The Sea Ranch. The home that they planned to pass to my parents, then to me, and to their beloved great grandchild; a 10-year-old who chooses trips to the Sea Ranch over trips to Disneyland and once drew that very same house her great grandparents built as her "dream house" for an assignment at school.

For over 50 years, our family has owned this home and used it as a private second residence. **We have watched and welcomed countless short-term renters in houses directly adjacent to and across from ours. They have come and gone for many years without incident. It seems unconscionable that we could be told that we are now not allowed to rent our home as well.** Ownership of our family home is passing to my elderly parents and we find ourselves in a position where the high cost of taxes, association fees, maintenance and general upkeep of a house on the coast is too high to manage. After 52 years of not doing so, we need to help cover the expense of the property through the short-term rental of our family home. You are being asked to consider provisions that will likely preclude my family from using our property as a short-term rental because we did not do so prior to a certain date (6.7.t). **Perhaps even more upsetting, simply because our neighbors have already been renting out their homes on a short-term basis, the Sea Ranch Association suggests that we should not be able to due to proposed "Density Limits" (6.7.aa).** I hope that you can see why this is highly problematic and certainly reeks of unequal treatment of homeowners- homeowners who live in the same neighborhood, pay the same taxes & fees and who may have the same need to rent their homes in order to not lose them.

## COMMENT 59

I support common sense standards to ensure the protection of the beautiful Sonoma Coast and the nature, wildlife and residents who call this area home but **I do not support the proposed restrictions presented by the Sea Ranch Association.** Restrictions on short term rentals at The Sea Ranch will do harm to my family as well as many other families who pay taxes and participate in the communities of Sonoma County. There are no valid justifications provided for restrictions on the number of rentals, the number of nights a property can be rented or the “density” of rentals, however there *are* clear negative impacts if these standards are accepted. **These restrictions will eliminate the ability for people from a variety of income brackets, ages and backgrounds to continue to buy, own and enjoy properties at The Sea Ranch.** It forces out individuals and families who have spent generations caring for, enjoying and introducing the Sonoma Coast to others. It discourages new buyers from purchasing. It causes property values and tax revenues to fall, as families like mine are forced to make the heart-breaking decision to sell; flooding the market with homes that are unaffordable in a region without the job market or infrastructure to support a significant full-time resident population. It is a flawed proposal and it does damage not only to current homeowners, but to the future of The Sea Ranch and to the ability to keep this remote part of the coast accessible to home-buyers and visitors from all walks of life.

I strongly oppose the TSRA Board’s Model Rule 6.7 and/or other restrictions on short-term rentals at The Sea Ranch. **I ask that you do not support or endorse this rule and do not delegate standards or restrictions on The Sea Ranch to the TSRA Board.**

Sincerely,

Leslie Harbaugh

**From:** [Kristen Haring](#)  
**To:** [PRMD-LCP-Update](#)  
**Cc:** [Chris Jaap](#); [Jennifer Merchant](#); [Neil Moran](#); [R Holmes](#); [crista lucey](#)  
**Subject:** comments on Sonoma LCP Public Review Draft  
**Date:** Thursday, July 22, 2021 3:36:11 PM

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## EXTERNAL

22 July 2021

We would like to take this opportunity to address a few provisions of The Sonoma Local Coastal Plan Revised Public Review Draft (LCP) that conflict, or create tension with, the LCP's express and repeated goal of promoting coastal access and visitor-serving recreational uses. The provisions, all contained in the Open Space and Resource Conservation Element, should confirm that human access for passive recreation is possible – and is, in fact, protected – even within areas that are habitats for marine mammals and seabirds. Such clarification is necessary because the entire Sonoma County coast could be described as such a habitat.

Policy C-OSRC-5b(1) (regarding environmentally sensitive habitat) states in subpart (4) that “[a]reas that contribute to the viability of plant and animal species for which there is compelling evidence of rarity” are considered environmentally sensitive habitats. “Compelling evidence of rarity” is an uncertain, purely subjective standard that provides no guidance. It undermines the clear standards established in the policy's first three subparts, and will spawn disputes regarding whether there is sufficient evidence of rarity.

Policy C-OSCR-5e(3) (regarding marine habitats) states that “[p]ublic access to offshore rocks and onshore nesting/rookery areas used by seabirds to breed or nest or which provide habitat for seals and sea lions shall be prohibited.” By addressing bird-nesting and seal-rookery areas with a single slashed phrase, the policy could be misconstrued to prohibit access to all areas that “provide habitat for seals.” That would result in a prohibition of access along the entire Sonoma County coast. A clearer statement should be made by using separate clauses, such as: “Public access shall be prohibited to offshore rocks and onshore areas while seals and sea lions are using them as rookeries, and to offshore rocks and onshore areas while seabirds are using them to breed or nest.”

Similarly, Policy C-OSCR-5e(5) (regarding marine habitats) states that “[d]isturbance of marine mammal haul-out grounds shall be prohibited and recreational activities near these areas shall be limited to passive recreation [and] [d]isturbance of areas used by harbor seals and sea lions shall be avoided.” This provision is overbroad and, again, contradicts the LCP's public-access goals. By failing to define “disturbance” and “passive recreation,” the provision could be misconstrued to mean that human activity near a haul-out ground is prohibited.

Finally, Policy C-OSCR-5e(6) (regarding marine habitats) encourages the California Department of Fish and Wildlife to monitor marine mammal haul-out grounds annually “to determine their condition and level of use by marine mammals” and “to incorporate this information into its management plan for marine mammals.” These provisions should acknowledge that there are numerous suitable haul-out grounds that marine mammals can and do use, and the number of such grounds in an area reduces the need to prohibit human activity on the relatively few accessible beaches.

Thank you for inviting comment, and for considering the comments made here.

Sincerely,  
Kristen Haring  
Roxanne Holmes  
Crista Lucey  
The Sea Ranch

cc

Chris Jaap, board liaison to LCP Working Group, The Sea Ranch Association  
Jennifer Merchant, community manager, The Sea Ranch Association  
Neil Moran, board chair, The Sea Ranch Association

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**From:** [Diane Hichwa](#)  
**To:** [PRMD-LCP-Update](#); [PlanningAgency](#)  
**Subject:** LCP Sonoma County ESHA map questions and corrections  
**Date:** Wednesday, July 28, 2021 12:25:10 AM

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## EXTERNAL

I was unsure about the two different emails provided in materials. So am sending to both.

Please let me know if I can clarify any of my comments and locations.

My focus is on the ESHA maps in the packet, some corrections and additions.

1. Correction to map 2: Black Point is actually the point to the N; Bihler Point is what you have labeled Black Pt
2. ESHA designations: Use of SR for seabird rookery and SN for seabird nesting. What is your definition?
3. Map subarea 1 Gualala Pt Island is definitely SR, a rookery with more than 2000 birds (Common Murre COMU Brandts Cormorants BRAC, Western Gull, Š)

Policy C-OSRC-5e(3) refers to Public access Š..provide habitat for seals and sea lions shall be prohibited  
 Š.but I do not see these locations designated for protection.

4. Map subarea 1 at very S end is missing an important Marine Mammal haul out and large pupping area of Harbor Seals. (at the very S end where it says RI for rocky intertidal. This is Tidepool beach, immediately N of the northern Shell Beach within Sea Ranch.
5. Map subarea 5 at Ft Ross between Windermere Pt and NW Cape has a rock that is a consistent haul out for Steller Sea Lions
6. Map subarea 6 near Jenner is missing haul out and pupping area for Harbor Seals at the mouth of the river. There is another haul out to the north of russian gulch.
7. Map subarea 9 Bodega Rock has SN but should include Marine Mammals with Harbor Seals, Steller Sea Lions and CA Sea lions PLUS it is SR a rookery for BRAC and now COMU
8. No map is showing ESHA for Snowy Plover (Doran Beach and Salmon Creek Beach) a listed and protected species!
9. The Globally Important Bird Area of Bodega Bay should have protection of the mudflats and feeding areas for these birds.

This area is also a crab nursery.

And on the coast I believe there is no place for wind energy with its disturbance to marine mammal migratory routes and an extensive land grid would be needed to support and distribute the power.

Diane Hichwa

Email: [dhichwa@earthlink.net](mailto:dhichwa@earthlink.net)

Telephone: 707-785-1922 (Sea Ranch)  
707-483-3130 (cell)

More Tail Wagging!!! Less Barking!!  
Millie 2007

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**From:** [JACOBS, Joseph](#)  
**To:** [PRMD-LCP-Update](#)  
**Cc:** [DK \(Kai\)](#)  
**Subject:** Local Coastal Planning Meeting: TSRA proposals to modify Short Term Rental Use  
**Date:** Monday, July 26, 2021 11:15:49 AM

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## EXTERNAL

Dear All-

We have been visiting the Sonoma Coast from Jenner north for more than thirty years. A little more than three years ago my wife and I succeeded to purchase a property in the Sea Ranch. Our plan is to move to the area within the next three years. Prior to that time, we are renting and would like to continue to provide our house as a vacation option to other by renting it.

We enjoy the rugged beauty of the Sonoma coast. We chose to rent our house because it helps us financially but we also have set up a place where others can enjoy the Sonoma Coast. We realize that rentals, if not well managed, could degrade the experience to permanent residents as well as other renters. We fully agree that short term rentals (STRS) need to balance use and impact. During our three years of renting, one-third of our rental income has gone into the community of the Gualala and the surrounding areas. In addition to providing access to the coast, well managed rentals provide significant dollars to the local economy. We have also invested substantially into the renovation of our house, providing additional income to the Gualala area.

We appreciate the need for Planning Department to review STR impacts on all of the Sonoma county coast. Our personal experience (as a renter and an owner) has been that the several rental agencies do their best to provide a good experience for the renters and residents. We agree with TSRA that as owners we are "motivated by the character of the natural environment.. and accept..the principle that The Sea Ranch must persevere the character for its present and future enjoyment".

We do not agree with some of the proposals made by The Sea Ranch STR committee. Specifically, we think **Model Rule 6.7** unfair and difficult to establish.

How will the Planning commission or TSRA determine

1. How to "Limit the total number of vacation rentals"?
2. Decide which units in proximity will be rented. Section 6.7.2 "Limits on the proximity of vacation rentals to each other".

We ask that you neither endorse the TSRA recommendations for STR management and more importantly, that this decision should stay with the commission so that the same standards are applied to all rentals (inside and outside The Sea Ranch).

Thank you for your considerations.

Joseph Jacobs  
Danette Krueger

36549 Sculpture Point  
The Sea Ranch.

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From: [ckenber@sbcglobal.net](mailto:ckenber@sbcglobal.net)  
To: [PRMD-LCP-Update](#)  
Subject: LCP Performance Standards  
Date: Monday, July 26, 2021 11:09:37 AM

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## EXTERNAL

(I am resending this with a minor correction)

Good morning:

I am a Sea Ranch association member since 1977 and a home owner since 1985. We have rented our home on a short term basis since 1985 without incident. I've also served as the Chair of the Sea Ranch Board's Finance Committee for a number of years and as one of the architects of the very successful fiber optic network installed a few years ago.

I am one of the leaders of the Sea Ranch Hosting Coalition which includes some 200 Sea Ranch members. I support the implementation of performance standards across the coastal zone as you are recommending. I oppose the implementation of restrictions on short term rentals such as caps, number of days rented per year, or distancing. These have been proposed by the board of the Sea Ranch Association against the backdrop of overwhelming member opposition.

Short term rental restrictions may be appropriate in urban locations where there is a shortage of housing in residential areas. Sea Ranch was not designed to be a residential community and is not a full time residential community today. Around 2/3 of the homes on Sea Ranch are second homes. About 350 of these homes are available for short term rental - a number that has been consistent for more than 15 years. Short term rental income makes the purchase of a Sea Ranch home feasible for most buyers who rent - though it rarely covers the cost of ownership. Short term rental restrictions will not increase the availability of affordable housing with the least expensive Sea Ranch home now costing well over \$1 million.

Short term rentals on the Sea Ranch generate TOT income for Sonoma County, a voluntary 3.5% contribution to the Sea Ranch budget and around \$10 million per year in benefit to the local economy. Short term rentals provide affordable access to a beautiful segment of the Sonoma Coast for those who can't afford or choose not to purchase Sea Ranch home. Short term rentals have been a part of the Sea Ranch experience since its founding. They are not proliferating and the imposition of restrictions cannot be rationally justified.

I urge support of short term rental performance standards across the coastal zone and ask the Sonoma County Board of Supervisors not to delegate authority to the Sea Ranch to make up its own rules.

Respectfully,

Chris Kenber

ckenber@sbcglobal.net  
925-838-2296 Home  
925-787-0962 Cell

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July 21, 2021



TO: Members of the Sonoma County Board of Supervisors  
 Members of the Sonoma County Planning Commission  
 Tennis Wick, Director, Permit Sonoma

**RE: Local Coastal Plan**

Thank you for your ongoing commitment to housing availability and affordability, and for allowing us to comment on this important proposal. NBAR and our affiliates are an integral part of the coastal community and one of the primary advocates of property rights and a sustainable housing economy in Sonoma County. Please accept this communication as our organizations requested points for consideration when determining amendments to the Local Coastal Plan – takings, managed retreat, shoreline protection, and short-term rentals.

**AVOID TAKINGS:** Article I, Section I of the California Constitution clearly states that it is an inalienable right to protect private property from damage. In areas where it is impractical and inappropriate to retreat, governments and communities should cooperate to develop both soft and hard solutions to Sea Level Rise, including beach nourishment, offshore reefs, breakwaters, groins, bulkheads, and community seawalls. **Should rare situations occur in which regulations don't allow redevelopment on land parcels affected by sea level rise, government should have funding mechanisms in place to purchase the land at fair market value through eminent domain.**

**JUST COMPENSATION:** Regulations that would prohibit a property owner from armoring their home or business to provide protection from rising seas and storm waves raises serious concerns pertaining to a regulatory taking without just compensation, and any such regulations must comport with the following Constitutional principles and the Coastal Act itself:

- Fifth Amendment of the U.S. Constitution: The "Takings Clause" of the Fifth Amendment of the U.S. Constitution states that government cannot take private property without just compensation:
  - *No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a grand jury, except in cases arising in the land or naval forces, or in the militia, when in actual service in time of war or public danger; nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.*
- Constitution of the State of California also has strong protections for private property; Article I - Declaration of Rights - Section 1 (emphasis added)
  - *(a) All people are by nature free and independent and have inalienable rights. Among these are enjoying and defending life and liberty, acquiring, possessing, and protecting property, and pursuing and obtaining safety, happiness, and privacy.*
- California Coastal Act (emphasis added)
  - *Section 30010 (emphasis added) The Legislature hereby finds and declares that this division is not intended, and shall not be construed as authorizing the commission, port governing body, or local government acting pursuant to this division to exercise their power to grant or deny a permit in a manner which will take or damage private property for public use, without the payment of just compensation therefor. This section is not intended to increase or decrease the rights of any owner of property under the Constitution of the State of CA or the United States.*

## COMMENT 64

**MANAGED/PLANNED RETREAT** is a commonsense land use practice where practical, especially in rural areas where existing structures can be relocated further inland when they are demolished and rebuilt, so that they will never need a shoreline protection device. This should be implemented where practical, however on some parcels, especially where there is not a deep enough area to relocate the development, managed retreat is not practical, and **property owners must be allowed to defend their property from wave attack**. These coastal communities are critical to CA both economically and culturally, and they should not be surrendered to the sea, as long as there is a viable method to protect them.

**MANDATORY ROLLING SETBACKS.** Mandatory Rolling Setbacks should be replaced with Tiered Response, a planning principle that institutes certain defined policies if, and only if, there are specific thresholds of sea level rise that are observed, measured and documented, as opposed to relying only upon projections. There are multiple options that can be incorporated into a tiered response policy including, but not limited to, beach nourishment, kelp forests, offshore reefs, groins, submerged breakwaters and community seawalls. These options should be adopted as preferred alternatives to managed retreat in areas that cannot accommodate relocation of developments and those that prohibit property owners from defending their homes, businesses and related infrastructure.

**Policy C-PS-1:** Develop a comprehensive adaptation plan and incentives for planned retreat or relocation from hazard areas ; (1) establish mandatory rolling setbacks for future development or significant redevelopment in areas that are likely to be affected by the impacts from sea level rise within the anticipated lifetime of the structures.

**DEED RESTRICTIONS/WAIVER OF RIGHTS.** Oppose requirement of a deed restriction of property and the waiver of rights as defined in Appendix F (6). Placing deed restrictions on properties or requiring a waiver of rights directly impacts property value and could be considered a Taking requiring just compensation.

**ALLOW FOR MAINTENANCE AND REPAIR OF SHORELINE PROTECTION DEVICES.** Appendix F(6) also states the owner is responsible for maintaining the shoreline protection device, however, maintenance is not provided for elsewhere in the document unless the structure was in place prior to January 1, 1977. The policy also places legal responsibility for removing the shoreline protection device on the property owner should the device fail. If an owner is responsible as stated in 6 (a) and (b), then the County of Sonoma LCPA should include provisions for property owners to maintain and repair shoreline protection devices.

(6) A deed restriction or other legally binding document is recorded on the property which requires the following:

- a. Owner is to be responsible, including financially, for monitoring and maintaining the shoreline protection structure.
- b. Owner is to be responsible, including financially, for removing the shoreline protection structure if it fails or has an adverse effect on other properties which cannot be mitigated; the use it protects is abandoned/or the County, State lands Commission, or Coastal Commission determines the structure should be removed.

**“EXISTING”/ SHORELINE PROTECTION DEVICES:** We strongly oppose policies that prohibit the use, maintenance and or repair of shoreline protection devices, specifically, policies that limit their use to structures built before the adoption of the Coastal Act (January 1, 1977). The reference to the 1977 date can be found in Appendix F, which is a reference in the following policy:

**Policy C-PS-2I:** Avoid shoreline protection device construction, reconstruction, expansion, alteration, and/or replacement unless determined necessary by and compliant with California Coastal Commission and County of Sonoma Standards (Appendix F).

Appendix F states that shoreline protection devices shall be allowed only if all of the following criteria of the California Coastal Commission and County of Sonoma are met, the first being:

## COMMENT 64

- (2) The structure would serve to protect only an existing (i.e., in existence prior to the Coastal Act on January 1, 1977) principally permitted use, public road, or public beach.

**Existing as it relates to Coastal Redevelopment.** We oppose the sections of the Public Safety Element and the Glossary that define alteration of existing structures to be cumulative alterations beginning on or after the effective date of the Coastal Act (January 1, 1977). Recommend: Modify to reference certification date of the LCPA in 2001 rather than 1977.

Public Safety Element Page PS-14 Blufftop Redevelopment: (1) additions, exterior or interior renovations, or demolition of an existing blufftop home or other principal structure which result in: (1) Alteration of 50 percent or more of an existing structure, including but not limited to, alteration of 50 percent or more of the roof, foundation, exterior walls, interior load-bearing walls, or a combination of both types of walls, or a 50 percent increase floor area; or (2) Demolition, renovation or replacement of less than 50 percent of an existing structure where the proposed remodel would result in cumulative alterations exceeding 50 percent or more of the existing structure taking into consideration previous additions approved on or after the effective date of the Coastal Act (January 1, 1977).

Glossary: Coastal Redevelopment: Development that is located on a bluff top or at or near the ocean and land interface or at very low-lying elevations along the shoreline that consists of alterations including:

- 1) additions to an existing structure.
- 2) exterior or interior renovations; or
- 3) demolition of an existing bluff top home or other principal structure, or portions thereof, which results in:
  - (1) Alteration of 50 percent or more of major structural components including exterior walls, floor and roof, and foundation; or a 50 percent increase in floor area. Alterations are not additive between individual major structural components; however, changes to individual major structural components are cumulative over time from the effective date of the Coastal Act (January 1, 1977).
  - (2) Demolition, renovation, or replacement of less than 50 percent of a major structural component where the proposed alteration would result in cumulative alterations exceeding 50% or more of a major structural component, taking into consideration previous alterations approved on or after the effective date of the Coastal Act (January 1, 1977); or an alteration that constitutes a less than 50 percent increase in floor area where the proposed alteration would result in a cumulative addition of greater than 50 percent of floor area, taking into consideration previous additions approved on or after the effective date of the Coastal Act (January 1, 1977).

**SHORT-TERM RENTALS** have been a non-regulated on the coast for years. What has the collective experience taught us that will be useful going forward? Many assumptions are made when limits on the use of property are adopted; the compromise of the use of private property should be approached only after exhaustive research, testing of assumptions and alternatives, and with transparent engagement with owners of that property. The ability for a local homeowner to rent their property as a means of income on a short-term basis is often critical.

We continue to urge the engagement of homeowners and industry experts to ensure the creation of a balanced, data-driven approach to the regulation of short-term rentals. Visitor-serving uses, especially those that allow families and small groups to lodge together more affordably than a multiple-room hotel stay, have been operating for decades and should be protected. **We encourage the creation of an evidence-based program where small/individual owners that seek to rent their property can continue to fortify their income while complying with countywide standards, TOT requirements.**

**Prior to the adoption of new limits on short-term rentals, we urge the County to consider:**

1. What problem are we trying to solve and how is that best accomplished?

## COMMENT 64

2. Are our assumptions about motives and impacts correct – nuisance, housing scarcity, etc.?
  - a. Does the data indicate legitimate complaints/concerns?
  - b. Will a long-term rental result if a short-term use is prohibited?
3. What will be lost if existing practice is severely limited – local owners' income, coastal accessibility, lodging economy, employment, transportation changes, etc.?
4. Does the history, distance to workplace hubs, and fundamental nature of the coastal zone lend itself to short-term use?

**CA Coastal Commission:** *The CCC has not historically supported blanket VR bans under the Coastal Act, and has found such programs in the past not to be consistent with the Coastal Act. The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry. VRs provide an important source of visitor accommodations in the coastal zone, especially for larger families and groups and for people of a wide range of economic backgrounds. We strongly support developing reasonable and balanced regulations that can be tailored to address the specific issues within your community to allow for vacation rentals.*

*Program C-LU-1: Establish performance standards for the use of existing residences for vacation rentals and hosted rentals. In developing standards consider; requirements for designated property managers, safety, parking, noise, and number of guests allowed for day time and nighttime occupancy. In addition to performance standards, identify areas where high concentration of vacation rental would impact environmentally sensitive habitat areas, water quality, or coastal access and develop land use policy to avoid these impacts. (NEW)*

We are eager to serve as a resource and collaborator for a strong housing economy for Sonoma County. Thank you for your consideration. **Please contact Lisa Badenfort, Public Affairs Director, with questions or opportunities for engagement at (707) 636-4294 or [lisa@northbayrealtors.org](mailto:lisa@northbayrealtors.org).**

Respectfully,



Carol A. Lexa, Past-President  
Local Government Relations Committee, Chair

cc:

Supervisor Susan Gorin, District 1  
Supervisor David Rabbit, District 2  
Supervisor Chris Coursey, District 3  
Supervisor James Gore, District 4  
Members of the Sonoma County Planning Commission  
Tennis Wick, Director, Permit Sonoma

**From:** [Anne Lown](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Cc:** [Rick Hecht](#)  
**Subject:** Objection to rental restrictions  
**Date:** Wednesday, July 21, 2021 4:01:16 PM

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## EXTERNAL

Dear Members of the Sonoma County Planning Commission,

As Sea Ranch residents and whose primary residence is Sea Ranch, my husband Rick Hecht and I want to express our concern and disagreement with the currently proposed rental restrictions that you will be reviewing on July 26. We bought our house four years ago knowing that we would rent it until we retired there one day. We have generally used the house once or twice a month and during covid, lived there for 15 months with extended family. That house is beloved by all of us.

Rental restrictions would cause us hardship and decrease the home's value if we were to sell it. We feel like the rules are being changed on us--without adequate preparation and discussion.

Further, we do not want to live in a restricted and exclusive enclave that includes primarily wealthy residents. We appreciate the renters who are good for the economy and bring life and fun to Sea Ranch. Plus, everyone should have the chance to visit the coast.

In particular, we object to the 300 foot rule, restrictions on the number of houses and the number of days one can rent.

Thank you.

I am open to careful and thoughtful discussions about our rental policy, but we have not--as homeowners and Sea Ranch residents--been invited into the conversation about rental restrictions. There has been a lot of discussion about a few party houses, but one board member said the party houses are not the main issue. He said the goal was to align resident/rental balance. I don't know what is out of balance? I am not sure what problem is being addressed here. The process has not been transparent. Please send this proposal back to Sea Ranch for open and healthy discussion before making a ruling. Thank you.

Anne Lown and Rick Hecht

--

E. Anne Lown, Associate Adjunct Professor  
Department of Social and Behavioral Sciences  
Affiliate Faculty, Osher Center for Integrative Medicine,  
3333 California Street  
University of California, San Francisco  
San Francisco, CA 94118  
(415) 502-2893, [anne.lown@ucsf.edu](mailto:anne.lown@ucsf.edu)

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**From:** [cathy mabry](#)  
**To:** [Scott Hunsperger](#); [Chelsea.Holop@sonoma-county.org](mailto:Chelsea.Holop@sonoma-county.org); [PRMD-LCP-Update](#)  
**Subject:** Sea Ranch Hosting Coalition and The Sea Ranch Board Short Term Rental Proposal  
**Date:** Monday, July 26, 2021 2:00:15 PM

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#### EXTERNAL

We have been Sea Ranch (TSR) homeowners for 36 years. Our home is used as a vacation getaway for family. It is not our primary residence. We have it on the short term rental market as it allows others to experience and appreciate all TSR has to offer. The majority of homes in TSR are second homes. Many are on this short term rental program as it is a “win-win” for both owners and guests. This market has been stable for many years. Our homes are held to a high standard based on existing Sea Ranch regulations. Our short term rental guests have been respectful of our home, property and Sea Ranch grounds. As the short term rental rates are usually \$250/night and above guests are here to appreciate our Northern California coastline. Regarding this Model Rule 6.7 proposed by TSR Board, I find it interesting that the Board is proposing short term rental restrictions without any input from members. There have been no credible studies, no facts upon which their proposal is based, no consultants hired to provide objective feedback regarding their short term rental concerns and no objective justification without this background research to support their proposal. In review of Model Rule 6.7 you will find it lacking in concrete evidence sufficient to warrant approval. As a Sonoma County resident I also want to bring up the financial ramifications if TSR Board proposal is approved. I believe the county gets a fairly substantial percentage of the TOT tax. Not having access to specific financial data I would guess there may be several thousand dollars annually in revenue. I don’t want to see us lose that by approving restrictive regulations without sound basis. I ask that you vote against TSR Board proposal. Thank you.

Sent from my iPad

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To: PRMD – Local Coastal – Update Comment Letter

July 21, 2021

Our families have lived in the Timber Cove/Fort Ross area since the 1940's and are concerned about the information in the proposed LCP being incorrect and would like to meet with whoever is proposing changes on our properties so that corrections can be made. If changes are being made to anyone's property, they should be made aware of them before making the changes so they can contest it.

On Parcel 109-050-012:

Appendix B: Public Access Plan much of the information regarding Ocean Cove Campground is incorrect and we would like to have it corrected. Ocean Cove has had cabins and camping since the 1940's as well as day use. The offers of dedication were accepted and recorded as a condition to constructing a single family residence on the property after proper negotiation.

Also, why is the acquisition priority being moved to 1 Priority, and why is an additional offer to dedicate our boat launch being required when it has not been required for other boat launches.

On Parcel 109-210-005:

Our forester advised us to check with the county because it looked like they were changing the TPZ Zoning. I called and was told the zoning was not changing and we would like confirmation in writing.

Our Parcels 109-050-010 and 109-050-030:

These parcels were Tourist Commercial. Why are they being changed to Village Commercial and how does that affect us.

On Parcel 109-190-007, 20885 Hwy 1, Jenner:

Our two homes are the oldest in Timber Cove. We want to be included in Rural Communities Boundary. Also, the many homes in the Ocean Cove area should be included. The homes on both sides of 20885 Hwy 1 are included and ours are excluded.

It also appears Policy C-PA-1d that the Parks or County are going to require a public access easement requirement east of Highway 1 for any development. Would this include a home or home improvement? Please let the community know the details if you are going to want public trails around private homes.

I believe the community is still in the dark with the details of the proposed new LCP and more worried just about surviving the Covid Pandemic rather than studying this very complicated Coastal Plan at this time.

  
William McMaster

  
Gary Manaro

23125 Highway 1  
Jenner, CA 95450



COMMENT 68

July 26, 2021

Gary Helfrich  
PRMD-LCP-Update@sonoma-county.org

**Re: Comments on the Open Space and Resource Conservation Element of the Sonoma County Local Coastal Plan Draft – June 22, 2021**

Good Morning,

On behalf of the Milo Baker Chapter (Sonoma County) of the California Native Plant Society, thank you for the opportunity to share our comments on the Open Space and Resource Conservation Element of the Sonoma County Local Coastal Plan (SCLCP) dated June 22, 2021. The Milo Baker Chapter is dedicated to protecting native plants and their habitats in Sonoma County. Many of these habitats are imperiled from development including native grass prairies, valley oak woodland, vernal pools and other wetlands.

We have reviewed the SCLCP Open Space and Resource Conservation Element and have a few suggestions.

The purpose of this Local Coastal Plan Update is to help guide land use planning and development decisions within Sonoma County's Coastal Zone.

How can this document guide land use planning and development decisions when the baseline conditions of the acreages of vegetative communities and rare plant occurrences are not known? There are no estimations of existing acreages of native vegetation communities within coastal zone of Sonoma County that can be compared when analyzing the effects of various development projects. With a lack of known acreages of what is being developed, the permits do not protect aquatic resources and wildlife habitat. *We recommend acreages of vegetative communities be estimated based on aerial analysis and added to the document.*

Implementation Program C-OSRC-1 recommends considering reviewing and updating Figures C-OSRC-2a through 2k every five years to reflect documented occurrences or changes in such habitats.

*We agree that these Figures should be updated every five years.* This would provide valuable on-going information for future planning and preservation of sensitive biological resources.

The Local Coastal Plan Update provides potential Environmentally Sensitive Habitat Areas on Figures C-OSRC-2a through 2k, although they are not intended to be an

exhaustive compilation of the habitat areas that may meet the ESHA definition. As a result, a Biological Resource Assessment shall be required to determine if a project could impact biological resources.

It should be made clear in the Local Coastal Plan Update document that special status biological resource (as identified in Policy C-OSRC-5b(2)) surveys as well as a wetland delineation must be conducted of a proposed project area to determine if these sensitive biological resources are present. *To fully determine if such species are present or absent, multi-year surveys must be conducted per proposed project.* This should be identified in the document for future developers.

Policy C-OSRC-5f(5) addresses specific activities to preserve coastal terrace prairie at two specific areas.

Coastal terrace prairie is a sensitive natural community and should be preserved at all locations. Coastal prairie is typically found within a belt extending from the coast to a few kilometers and usually contains significant amounts of both native and exotic perennial species. California oatgrass (*Danthonia californica*) and purple needle grass (*Nasella pulchra*) are the dominant grasses in a much richer assembly of native flowering plants that are collectively recognized as a unique plant community.

We feel that with these modifications to the SCLCP language, our vegetation communities within Sonoma County will be better protected. Thank you for your consideration.

Best Regards,

Wendy Smit, President of Milo Baker Chapter of California Native Plant Society

**From:** [1mjmack](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** July 26 meeting Coastal Short Term Rentals  
**Date:** Tuesday, July 20, 2021 2:11:19 PM

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**EXTERNAL**

Hello,

It is my understanding that Monday's meeting will be to discuss limiting short term rentals under the Coastal Commission.

Please understand some of us depend on the income from short term rentals. I'm a disabled senior citizen who would need county assistance if you take away my income source. We don't need to cause more homelessness due to income squeeze and home loss.

Beyond me my home offers tranquility to visitors to reset and recharge. It helps society in this fast paced world.

My contention with limiting certificates or amount of days we can rent means limiting the general public from access to our coast. I find it fascinating that local officials don't get the benefits of a sharing society. The changes you are proposing would turn our community into a cold world were only rich can afford to live here. It would start to collapse the ability of small businesses, restaurants, stores, etc to survive.

We are becoming a nation of rich and poor with fewer middle class. Please understand that your actions will reverberate for years and change the resort atmosphere of our north bay coast.

Regards,

MJ

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**From:** [Laura Morgan](#)  
**To:** [Gary Helfrich](#)  
**Cc:** [Tennis Wick](#); [district5](#); [Stephanie@Coastal.Rexing](#); [peter.benham@coastal.ca.gov](#)  
**Subject:** Letters of LCP draft concerns from SSC and others, to Permit Sonoma  
**Date:** Monday, September 27, 2021 11:11:24 AM

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**EXTERNAL**

Dear friends,

Here are links to Conservation Lands Network's Bay Area maps. In particular, there are two maps which include the Sonoma Coastal Zone, worth consulting: *Stream Conservation Targets* and *Connectivity* (showing habitat corridors).

Thanks again,  
Laura

<https://www.bayarealands.org/maps-data/#maps>

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**From:** [Chris Poehlmann](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** LCP update comments-OSRC-7- edited email comments  
**Date:** Monday, July 26, 2021 2:58:15 PM  
**Attachments:** [Shaded Fuel Break Description and Prescription \(PDF\).pdf](#)

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**EXTERNAL**

Dear Staff,

This comment will be likely directed towards the C-OSRC-7 Fire Resiliency Plan plus the element that deals with view corridors.

~C

For the Open Space and Resource Conservation Element:

I would like to advocate for mandated shaded fuel break silvicultural prescriptions in Timber Harvest Plans along county roads especially those roads that begin on the coast and then continue inland out of the Coastal Zone. This type of harvesting has the best provisions for maintaining visual resources and fire prevention. This change would have many fire prevention and visual resources advantages for these roadways. Example of such roads would be 116, Stewarts Point, and Annapolis Road.

Continuity of the protections for view corridors and county roads should reflect this physical continuity. The view corridors and other county roads need the protection for their complete length, from the coast and inland. The General Plan should be updated to include this protection of all county roads using the available "shaded fuel break" silvicultural prescription in CalFire regulations for timber harvest plans.

At the moment all types of prescriptions can happen right up to the road's edge. These prescriptions most times create visual blight that lasts for decades and also increase fire risks due to production of slash as a ladder fuel and also remove the larger trees that are the most resistant to fire and ignition. I am sending in a description of this silvicultural prescription in comment email.

Please contact me for any further questions or background on this opportunity to increase the visual beauty of our coastal county roads and also reduce fire risk. A silvicultural description is below.

Regards,  
Chris Poehlmann  
Annapolis, Ca.  
[chrispoehlmann@gmail.com](mailto:chrispoehlmann@gmail.com)

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**From:** [Chris Poehlmann](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** LCP update comments  
**Date:** Tuesday, July 27, 2021 10:53:14 AM

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**EXTERNAL**

I would also like to request another public meeting scheduled so that the community has the proper time and resources to comment fully on this effort.

~Chris

Regards,  
Chris Poehlmann  
Annapolis, Ca.  
[chrispoehlmann@gmail.com](mailto:chrispoehlmann@gmail.com)

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## SHADED FUEL BREAK

### Purpose/Overview

The purpose of the development, implementation and maintenance of a project such as fuel modification can be considered a fire prevention/management tool that may promote awareness, mitigation, and assist in fire suppression activities in the event of a wildland fire situation in Interface Lands. The objective is to reduce, modify, and manage fuels within designated areas that may enhance mitigation efforts in the event of a wildland fire situation. The Shaded Fuel Break is an identified key component of any project:

is a strategic location along a ridge, access road, or other location where fuels have been modified. The width of the fuel break is usually 100 to 300 feet depending on the site. This is a carefully planned thinning of dense vegetation, so fire does not easily move from the ground into the overhead tree canopy. A shaded fuel break is not the removal of all vegetation in a given area. Fire suppression resources can utilize this location to suppress wildland fires due to the modification of fuels of which may increase the probability of success during fire suppression activities. Any fuel break by itself will not stop a wildland fire.

The Shaded Fuel Break is a recommended guideline for fuel management within identified Interface Lands.

The goal is to protect human life and both public and private resources by reducing the risk and potential hazard of wildland fire by practicing management strategies that promote the preservation and restoration of natural resources and protection of cultural resources.

Objectives are mitigation of fire dangers in an effort to: Enhance public safety; Protect natural and cultural resources; Provide for recreational opportunities; Conduct cost effective maintenance of features and facilities.

## SHADED FUEL BREAK PRESCRIPTION

This is a defensible location to be used by fire suppression resources to reduce the hazard of wildland fires. Any fuel break by itself will **NOT** stop a wildland fire. It is a location where the fuel has been modified to increase the probability of success for fire suppression activities. Ground resources can use the location for direct attack. Air resources may use the location for fire retardant drops.

### Prescription

The intent of the fuel break is to create a fuel model or vegetative arrangement where wildfire reduces intensity as it burns into the fuel break. A ground fire, burning grass and leaf duff is the desired fire behavior. An arrangement which, provides the desired fire behavior effects, involves an area where ladder fuels are removed and tree or brush canopies will not sustain fire, and where the contiguous fuels arrangement is interrupted.

This general arrangement allows fire and resource managers to retain a species diversity of individual younger, middle aged and older plants, which allows the opportunity for an uneven aged vegetative type, without compromising the project objectives. For example, young saplings of individual oaks or conifers may be retained, although, they may be under the desired diameter, they may not contribute to undesired fire behavior effects. Additionally, it may be necessary to cull a few trees in a thick stand of conifers over the desired diameter in order to improve forest health. It is important to remember that this prescription is a guide, not an absolute. Site specific prescriptions may be developed later for individual projects which, all will be in accordance with the project objectives.

Implementation consists of removing or pruning trees, shrubs, brush, and other vegetative growth on the project area as prescribed. All work will be accomplished by use of hand crews, biological treatment or mechanical equipment; supported by chippers and/or burning as determined appropriate on a case-by-case basis. The preferred width of a shaded fuel break along a ridge top or adjacent to one is approximately 300 feet

Trees up to the 6-inch diameter at breast height (dbh) class are eligible for removal under this prescription. However, larger hazardous snags may be removed. Due to operational needs, it may be necessary to remove an occasional tree with a dbh larger than 6 inches based on forest health and project objectives. Individual trees under 6-inch dbh may be retained for diversity and if they do not disrupt project objectives. This will only be done on a case-by-case basis after proper review by all agencies.

Threatened and endangered plant and animal species, such as elderberry and other sensitive species, shall not be removed or treated, or otherwise adversely affected, within any shaded fuel break.

Cultural resources are a major resource and will be protected.

## 1. Understory fuels:

Understory fuels over 1 foot in height are to be removed in order to develop vertical separation and low horizontal continuity of fuels. Individual plants or pairs of plants may be retained provided there is a horizontal separation between plants of 3 to 5 times the height of the residual plants and the residual plants are not within the drip lines of an overstory tree.

## 2. Mid-story fuels:

Trees up to the 6-inch dbh may be removed. Exception to this size limit shall be trees that have significant defect and/or which do not have a minimum of a 16-foot saw log or trees, such as saplings, that do not present an undesirable effect. Live but defective trees larger than the 6-inch dbh providing cavities for obvious wildlife use will be retained.

Trees shall be removed to create horizontal distances between residual trees from 20 feet between trunks up to 8 to 15 feet between tree crown drip lines. Larger overstory trees (> 6-inches dbh) do count as residual trees and, in order to reduce ladder fuels, shall have vegetation within their drip lines removed. *Prune branches off of all residual trees from 8 to 10 feet off the forest floor, not to reduce the live crown ratio below 1/2 of the height of the tree.*

Criteria for residual trees (up to < 6-inch dbh):

**Conifers:** Leave trees that have single leaders and thrifty crowns with at least 1/3 live crown ratio.

Conifer leave tree species in descending order:

Sugar pine  
Ponderosa pine  
Douglas fir  
Knob-cone Pine  
Gray Pine  
White fir  
Incense cedar

Intolerant to shade species have a higher preference as leave trees because their seed will be less likely to germinate in the understory.

## 3. Snags:

Snags are a conduit for fire during a wildland fire. However, they also provide excellent wildlife habitat in their natural state. The following is the criteria of when snags shall be retained:

18-inch diameter class or larger and not more than 30 feet in height which are not capable of reaching a road or structure provided there is a separation of least 100 feet between snags.

**Hardwood trees:** Leave trees that have vertical leaders and thrifty crowns with at least 1/3 live crown ratio.

Hardwood leave tree species in descending order:

Valley Oak  
 Big Leaf Maple  
 Blue Oak  
 Black Oak  
 Madrone  
 Live Oaks

**Brush:** It is desirable to remove as much brush as possible within the shaded fuel break area. However, if individual plants or pairs of plants are desired to be left, leave plants with the following characteristics: young plants less than 5 feet tall and individual or pairs of plants that are no more than 5 feet wide.

From a fuels management perspective the following are brush leave species in descending order:

**Category 1**

Dogwood  
 Redbud

**Category 2**

Toyon  
 Buckeye  
 Coffeeberry  
 Lemmon Ceanothus  
 Buck brush (Wedge leaf ceanothus)

**Category 3**

Whitethorn  
 Deer brush  
 Manzanita  
 Chamise  
 Yerba Santa  
 Poison Oak  
 Scrub Oak

Non-native species (such as olive, fig, etc.) will be considered on a case- by- case basis.

3. Wetlands:

Wetlands and riparian areas will not be adversely affected for treatment and ground operations.

4. Watercourse and Lake Protection Zone (WLPZ):

To provide mitigation for riparian associated species and to reduce the potential risk of habitat fragmentation, the following will apply:

WLPZ widths and operational limitations shall be in conformance and consistent with Title 14, California Code of Regulations, 936.5, Procedures for Determining Watercourse and Lake Protection zone Widths, as approved by the California Board of Forestry.

**Class I watercourse (Fish bearing):**

Exclude from equipment operations (except on existing roads) and remove one thousand hour and smaller sized dead fuels ( $\leq 5$  inches in diameter).

**Class II watercourse (Aquatic habitat for non-fish aquatic species):**

No treatment of overstory and the treatment of understory will not reduce vegetative cover below 50%. One thousand-hour and smaller sized dead fuels ( $\leq 5$  inches in diameter) will be removed. Ground based equipment will not operate within the zone except on existing roads. Prune residual trees.

**Class III watercourse (No aquatic life present):**

Full shaded fuel break prescription will be implemented but no ground-based equipment will operate within exclusion zones except on existing roads.

## **BRUSH FIELD PRESCRIPTION**

Implementation consists of removing or pruning brush, and other vegetative growth on the project area. All work will be accomplished by use of equipment, masticator and/or hand crews supported by chippers and/or burning.

Due to operational needs tree canopies may need to be thinned, pruned or modified as part of the brush field fuel break prescription. This will only be done on a case by case basis after proper review by all involved agencies.

Threatened and endangered plant and animal species, such as elderberry and other sensitive species, shall not be removed or treated, or otherwise adversely affected.

Cultural resources are of a major concern in any area where they may exist. These resources will be protected.

### **Prescription:**

**Brush:** It is desirable to remove as much brush as possible within the brush field fuel break area. However, if individual plants or pairs of plants are desired to be left, leave plants with the following characteristics: young plants less than 5 feet tall and individual or pairs of plants that are no more than 5 feet wide. The distance between residual plants shall be 3 to 5 times the height of the residual plants. Three (3) times the height distance for slopes less than 30%, five (5) times for slopes equal to or greater than 30%.

The width of the brush field fuel break shall normally be 300 feet.

From a fuels hazard perspective the following are brush leave species in descending order:

#### **Category 1**

Dogwood  
Redbud

#### **Category 2**

Toyon  
Buckeye  
Coffeeberry  
Lemmon Ceanothus  
Buck brush (Wedge leaf ceanothus)

#### **Category 3**

Whitethorn  
Deer brush  
Manzanita  
Chamise  
Yerba Santa

Poison Oak  
Scrub Oak

Non-native species (such as olive, fig, etc.) will be considered on a case by case basis.

**Wetlands:**

Wetlands and riparian areas will not be adversely affected for treatment and ground operations.

**Watercourse and Lake Protection Zone (WLPZ):**

To provide mitigation for riparian associated species and to reduce the potential risk of habitat fragmentation, the following will apply:

WLPZ widths and operational limitations shall be in conformance and consistent with Title 14, California Code of Regulations, 936.5, Procedures for Determining Watercourse and Lake Protection zone Widths, as approved by the California Board of Forestry.

**Class I watercourse (Fish bearing):**

Exclude from equipment operations (except on existing roads) and remove one thousand hour and smaller sized dead fuels ( $\leq 5$  inches in diameter).

**Class II watercourse (Aquatic habitat for non-fish aquatic species):**

No treatment of overstory and the treatment of understory will not reduce vegetative cover below 50%. One thousand-hour and smaller sized dead fuels ( $\leq 5$  inches in diameter) will be removed. Ground based equipment will not operate within the zone except on existing roads. Prune residual trees.

**Class III watercourse (No aquatic life present):**

Brush field prescription will be implemented but no ground-based equipment will operate within exclusion zones except on existing roads.

## GRASS FIELD PRESCRIPTION

Implementation consists of mowing and possibly re-establishing native grass species on the project area. All work will be accomplished by use of heavy equipment, and/or hand crews.

Threatened and endangered plant and animal species, such as elderberry and other sensitive species, shall not be removed or treated, or otherwise adversely affected.

Cultural resources are of a major concern in any area where they may exist. These resources will be protected.

### **Prescription:**

**Grass:** Grass fuel breaks shall be a minimum of 300 feet wide. All grasses are to be maintained below four (4) inches in height just after the grasses cure cut in early summer.

### **Wetlands:**

Wetlands and riparian areas will not be adversely affected for treatment and ground operations.

### **Watercourse and Lake Protection Zone (WLPZ):**

To provide mitigation for riparian associated species and to reduce the potential risk of habitat fragmentation, the following will apply:

WLPZ widths and operational limitations shall be in conformance and consistent with Title 14, California Code of Regulations, 936.5, Procedures for Determining Watercourse and Lake Protection zone Widths, as approved by the California Board of Forestry.

#### **Class I watercourse (Fish bearing):**

Exclude from equipment operations (except on existing roads) and remove one thousand hour and smaller sized dead fuels ( $\leq 5$  inches in diameter).

#### **Class II watercourse (Aquatic habitat for non-fish aquatic species):**

No treatment of overstory and the treatment of understory will not reduce vegetative cover below 50%. One thousand-hour and smaller sized dead fuels ( $\leq 5$  inches in diameter) will be removed. Ground based equipment will not operate within the zone except on existing roads. Prune residual trees.



**Class III watercourse (No aquatic life present):**

Grass field prescription will be implemented but no ground-based equipment will operate within exclusion zones except on existing roads.

**916.5, 936.5, 956.5 Procedures for Determining Watercourse and Lake Protection Zone Widths and Protective Measures [All Districts]**  
**TABLE I**

<b>Procedures for Determining Watercourse and Lake Protection Zone Widths and Protective Measures<sup>1</sup></b>								
Water Class Characteristics or Key Indicator Beneficial Use	1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or  2) Fish always or seasonally present onsite includes habitat to sustain fish migration and spawning.		1) Fish always or seasonally present offsite within 1000 feet downstream and/or  2) Aquatic habitat for nonfish aquatic species.  3) Excludes Class III waters that are tributary to Class I waters.		No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high water flow conditions after completion of timber operations.		Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.	
Water Class	Class I		Class II		Class III		Class IV	
Slope Class (%)	Width Feet	Protection Measure	Width Feet	Protection Measure	Width Feet	Protection Measure	Width Feet	Protection Measure
					[see 916.4(c)] [see 936.4(c)] [see 956.4(c)]		[see 916.4(c)] [see 936.4(c)] [see 956.4(c)]	
<30	75	BDG	50	BEI	See CFH		See CFI	
30-50	100	BDG	75	BEI	See CFH		See CFI	
>50	150 <sup>2</sup>	ADG	100 <sup>3</sup>	BEI	See CFH		See CFI	
1 – See Section 916.5(e) for letter designations application to this table. 2 – Subtract 50 feet width for cable yarding operations. 3 – Subtract 25 feet width for cable yarding operations.								

## MAINTENANCE PRESCRIPTIONS

Once fuels have been modified within an area, maintenance activities should be planned and implemented on a regular basis to keep the effectiveness of the original treatment. If no maintenance activities occur, the effectiveness of the original treatment will diminish every year, potentially yielding no net effect within 5 years. The necessary maintenance activities will be minimal if implemented on an annual basis.

The original prescription treatment should be followed for maintenance. Possible fuel reduction techniques to be utilized for maintenance include the following:

**Hand Work:** Use of hand tools by crews or individuals. This technique is labor intensive and potentially expensive (>\$1000 per acre). Impacts to soils are negligible.

**Mechanical Work:** Use of heavy equipment such as masticators and/or bulldozers. This technique is moderately expensive (as low as \$400 per acre) but limited by topography (to slopes less than 50%) and not appropriate for most watercourse and lake-protection zones and excessively wet soils.

**Chemical Controls:** Use of California registered herbicides. This is the most cost-effective technique. Implementation usually requires one or two individuals for ground application. This technique has negligible soil effects but may not be appropriate for certain areas such as riparian zones, watercourses, and areas of listed plants.

**Prescribed Browsing:** Use of goats in a controlled setting to browse within appropriate areas to reduce fuel levels. Browsing goats can be an effective tool to control grasses and low growing vegetation, when controlled properly, can have little impact to the environment. Costs may vary.

**Prescribed Burning:** The use of planned and controlled burning operations to reduce fuel levels. Control lines are established prior to burning. Burning and Air Pollution permits are required to conduct these operations. This technique varies in cost per acre depending on complexity of project. Burning is becoming more difficult to complete due to air regulations.



**The Sea Ranch Association**

975 Annapolis Road  
P.O. Box 16  
The Sea Ranch, CA 95497-0016

**COMMENT 72**

Administration

tel: 707-785-2444  
fax: 707-785-3555

Tennis Wick, Director  
PRMD  
2250 Ventura Blvd.  
Santa Rosa, CA 95403

RE: LCP Update

July 20, 2021

Dear Director Wick:

I am writing on behalf of The Sea Ranch Association to thank the Planning Commission and PRMD staff for being responsive to many of our comments and integrating them into the Local Coastal Plan Revised Public Review Draft submitted for public review and Commission consideration. We were quite pleased to see so many of our changes integrated into the revised document, but some edits have brought up new questions and a couple others linger. Discussion regarding those issues follow.

The Association is aware that individual members have also transmitted oral and written feedback regarding how the Revised Public Review Draft addresses issues such as Short Term Rentals and conflicts between the proposed Plan's public access and wildlife protection policies. As can be expected in any community, while there is broad agreement among residents in some areas, The Sea Ranch is not monolithic in its views so opinions differ in other areas. A letter specific to the Board of Director's action on its goals regarding Short Term Rentals was sent June 22, 2021.

**POLICY ISSUES**

Environmentally Sensitive Habitat Areas

OSRC 5B10, Page 21 and C-LU-4, Page 27- TSRA continues to be concerned about the impacts of ESHA's on the ability to develop remaining vacant residential sites and undertake remodels and additions as allowed in the 1982 Precise Development Plan. We appreciate the above-referenced proposed policies that attempt to address these concerns, including OSRC5B10, intended to resolve ESHA impacts that could constitute a taking, and C-LU-4, which proposes to develop a manual that guides project review process roles, responsibilities and steps. The efficacy of these policies will be largely dependent on their implementation, including careful consideration regarding the cost of mitigation or project limitations imposed and also the process by which such a solution would be developed.

OSRC 5B10- While paying fair market value for residential lots deemed undevelopable due to new ESHA mapping is potentially an elegant solution to an otherwise intractable challenge, TSRA suggests that we and other stakeholders be engaged in developing the implementation plan to ensure it is streamlined in a way that does not increase due diligence costs and clarifies TSRA and County roles and responsibilities. This could possibly also include adding this option to the manual suggested in the Land Use section, discussed in further detail below.

C- LU-4- This is another welcome concept proposed to resolve confusion about roles and responsibilities. TSRA respectfully requests that PRMD staff work with Association staff and stakeholders in the development of this document. Given the fairly recent change of perspective regarding the need to assess new residential development at The Sea Ranch for environmental impacts outside the Coastal Act, this should be a high priority. We suggest that the final LCP include a timeline for implementation.

#### Land Use

Pages LU-5- While TSRA was gratified to read in Paragraph 2 of Section 2 on LU-5 the clarity with which the language on this page expresses our land use authority, we do find this language appears in some cases to be in conflict with other policies in the Revised Public Review Draft and believe clarification regarding which conflicting policies would actually apply should be provided.

Page LU-10- Dedicated Open Space Areas- It is unclear to TSRA how and where the County intends to apply this land use designation to TSRA property held in common. While thousands of acres of TSRA commons are designated as open space, other sites on commons are developed for the purpose of private recreation uses and should not, solely by virtue of this land use designation be planned for or required to be set aside as open space. Perhaps this is TSRA's misunderstanding of the intent. If that is the case, we request clarification to that effect.

Page LU-22- Policy C-LU-6f- This policy supports potential new lodging development by suggesting an increase capacity of overnight lodging on Annapolis Road. While we cannot find that flight path restrictions applied to commercial airports are applied to private facilities such as The Sea Ranch Association Air Strip on Annapolis Road, sites along Annapolis Road have not been further developed in the past in part because of the understanding that flight path restrictions do apply. TSRA requests clarification on whether flight path restrictions do or do not apply adjacent to its air strip and that the specific sites being considered for overnight lodging be more specifically identified.

Page LU-26- Policy C-LU-2i- The reference to urban service boundaries seems to imply expansion of development at The Sea Ranch beyond the scope of what is currently zoned and/or allowed. It is unclear how this applies to the fixed boundaries of The Sea Ranch.

#### Land Use- Housing

Pages LU 3-4- This high-level look at LCP priority land uses creates unresolved conflicts that are evident in other sections. Recreation and Coast Dependent Commercial are listed as high priorities while affordable housing is listed as a low priority. TSRA would like to point out a couple concerns about this illogical ranking.

Page LU-27- C-LU-2 adequately and appropriately addresses both affordable and workforce (missing middle) housing and its role in supporting the desired focus on coast dependent commercial activity by noting impacts of long commutes on environmental sustainability.

These two concepts are incompatible.

Priority recreation and commercial land uses require the existence of workforce housing. Even the most highly paid staff at TSRA and other businesses cannot afford to live on the Coast, where they would have shorter commutes that reduce impacts on traffic, air quality and quality of life. Businesses are having trouble attracting and retaining employees. This impacts health care, fire safety, recreation and coast

dependent commercial business viability, which in turn impacts overall livability and destination desirability.

Many TSRA employees commute daily from as far as Cazadero, Guerneville, Forestville and Fort Bragg. Of the four dozen or so affordable housing units on the coast, 45 are at The Sea Ranch. These units provide housing for businesses in Gualala, in Mendocino County to the north, but do not support the more than 80 employees who work at TSRA or other nearby small businesses in Sonoma County.

TSRA stands ready to engage in future implementation measures that acknowledge and prioritize the dire housing situation on the coast so that coast dependent commercial development and its other support systems such as fire, health care and administrative needs can survive.

#### ERRATA

##### Public Facilities and Services

Pag PF-2, Table C-PF-1- Update numbers for The Sea Ranch Water Company. Current correct numbers:

- Lots Served 1,862
- Vacant Lots: 439

Page PF-13- Fourth paragraph: replace “The Sea Ranch, staffed by CalFire personnel funded through CSA 40” with “North Sonoma Coast Fire Protection District (serving The Sea Ranch and Annapolis), staffed by CalFire contract personnel” [note CSA 40’s successor agency is no longer involved in our funding stream]

Page PF-14- Second line: Correct name is North Sonoma Coast Fire Protection District

Emergency Medical Services section:

First paragraph, second line: delete “Gualala Health Center”; replace with “Redwood Coast Medical Services (RCMS)”

Second paragraph, third line- strike “of communities”—this is a typo.

Thank you in advance for considering our further comments.

Sincerely,

Jennifer Merchant  
Community Manager

cc: Lynda Hopkins, Chair, Board of Supervisors

**From:** [Kathleen Alexander](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** LCP Vacation Rental Program Policy Option Meeting 7/26  
**Date:** Tuesday, July 20, 2021 5:31:18 PM

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## EXTERNAL

Dear Planning Department,

My husband and I own a home at the Sea Ranch. We just built the home, and received our final on July 1, 2020. (You were actually our planner when we came in to get our permit in Santa Rosa!). We had been renting at the Sea Ranch for 30 years before that. We rent our house part time, and live in it part time.

We have a great rental management company, and haven't had any problems with our renters annoying the neighbors. We're happy to have visitors enjoy the beautiful Sonoma coast, and our home. There are several other vacation rental houses on our street. (Which one of us homeowners would get to keep renting our home if this policy goes into effect and the Sea Ranch Association has the power to limit rentals to one every 300 feet?) We have never had any problems with the vacation renters on our street when we're here; in fact they are very respectful. The homes on either side of ours are both vacation rentals.

We enjoy seeing people walking by on the trails, and have noticed many more young families coming to the Sea Ranch, a welcome change! Covid brought many more people to this community, both owners and later, vacation renters, and I think part of the reason this proposal has been made is due to the obvious change in the number of people here. Everyone vacationing here is here to enjoy the coastal environment, as our family did before we had our own home, and it seems mean spirited to limit this access and try to keep it for just a certain group of people.

We weren't informed by the Sea Ranch Association Board that they were submitting a request to change the rules for vacation rentals, so it has come as a surprise, and frankly it's upsetting. The proposed restrictions seem like overkill meant to appease a small group of unhappy people. The property owners of the Sea Ranch were not informed about this proposal coming before the county in any of the many avenues they have to communicate with us.

We do have a Transient Occupancy Tax Permit, our management company has a business licence, and they collect and pay taxes for both Sonoma County and the Sea Ranch. We have garbage and recycling service through Recology year round. We limit the number of vacationers at our two bedroom house to four. We also have off street parking. All of these things are mentioned in the proposal as justification for limiting vacation rentals. Our vacation rental also employs Sonoma County residents for housekeeping, window cleaning, propane delivery, gardening service and general maintenance. Our vacation renters support the local economy when they come and patronize the grocery stores, restaurants, and gift shops.

Regarding the impact on the coastal environment mentioned in the proposal, from our observations, everyone stays on the well designated trails, which were meant to be used by all 2200(+) lot owners of the Sea Ranch, and their guests.

Please do not pass this proposal in any form. You would be giving a small group of people a

lot of power. What's next, will they limit the designated public parking lots and public access trails?

Sincerely, Kathleen and Tom Alexander  
182 Sounding  
The Sea Ranch, CA 95497  
808-283-1166, 650-534-5006  
182 [Sounding@gmail.com](mailto:182.Sounding@gmail.com)

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## COMMENT 74

**From:** [Teri Quatman](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Sea Ranch rentals  
**Date:** Tuesday, July 20, 2021 7:28:15 AM

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### EXTERNAL

I support the rental program at Sea Ranch.  
It is the faucet that attracts new homeowners to the ranch  
and keeps our investment valuable.  
I was a renter here for 10 years before I bought my Hedgegate house.  
It would be germane to this question to study how many current homeowners  
were once renters. I suspect a very large percentage!

If there are specific complaints (e.g., noise, littering, etc), those  
complaints should be addressed versus a shutting down of all rental  
activity.

Thanks,  
Dr. Teri Quatman  
39034 Hedgegate Rd.  
The Sea Ranch, CA.

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## COMMENT 75

**From:** [Chelsea Holup](#)  
**To:** [Gary Helfrich](#)  
**Subject:** FW: Sea ranch short term rentals (Public Comment)  
**Date:** Tuesday, July 20, 2021 10:06:16 AM

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-----Original Message-----

From: James Snidle <jimsnidle@icloud.com>  
Sent: July 20, 2021 10:06 AM  
To: Chelsea Holup <Chelsea.Holup@sonoma-county.org>  
Subject: Sea ranch short term rentals

EXTERNAL

Dear Chelse

I am a part timer in the sea Ranch community and live here six months of the year.  
The remaining 6 months the home is a vacation rental allowing one couple to enjoy the beauty of the ocean.  
I have never had a complaint from neighbors that do live here full time.  
I am totally opposed to any restrictions on part time rentals in Sea Ranch.  
It is also economically important to receive this income as I am semi retired.  
We have been here for 4 years and have welcomed visitors with never one complaint. Visitors come for the beautiful serenity our space offers.  
Please do not place any restrictions on our short term ability to rent our properties.

James Snidle

Daniel Rossomano

We live on Mariners Drive.

Sent from my iPhone

Sent from my iPhone

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**From:** [Sanjay](#)  
**To:** [PRMD-LCP-Update](#)  
**Subject:** Sea Ranch Short Term Rental  
**Date:** Thursday, July 22, 2021 5:30:51 PM

---

EXTERNAL

I have owned a home in Sea Ranch for 30 years and have had my home on short term Rental for many years, it is my primary source of income, I am not sure how you have the authority to take away my ability to earn an income and do it effectively retroactively. Last I checked no one has the ability take the right to take away another persons ability to earn a living. What do you propose the compensation should be taking away my living?

Sanjay Sakhujia  
20 South Linden Ave  
South San Francisco, CA 94080  
415 407-1919

[www.dpi-sf.com](http://www.dpi-sf.com)

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**From:** [Sarah Hoople Shere](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Subject:** Please reject proposed restrictions from The Sea Ranch Association board  
**Date:** Thursday, July 22, 2021 11:23:24 AM

---

**EXTERNAL**

Hi there,

My husband and I are homeowners at The Sea Ranch -- truly one of our favorite places on earth -- and plan to occasionally rent our house to offset the steep cost of ownership and to share The Sea Ranch with responsible guests.

We are very protective over The Sea Ranch and are committed to retaining its magic -- part of which has been the experience it's provided to visitors since its establishment. Like all other homeowners we know, we communicate strict standards of behavior to our guests so that The Sea Ranch experience is preserved for others. We've seen no evidence of negative consequences due to short-term rentals and strongly urge the commission to demand such an analysis before any restrictions be considered.

Thank you for your time and consideration.

Sarah Hoople Shere

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**Chelsea Holup**

---

**From:** Kyle Spain <kyle.spain@charter.net>  
**Sent:** July 19, 2021 4:51 PM  
**To:** Chelsea Holup  
**Subject:** Sea Ranch - Short Term Rental Restrictions

**EXTERNAL**

Chelsea,

As an owner of a house in Sea Ranch, which I rent on a short term basis, I am opposed to the current restrictions being suggested by the TSRA (The Sea Ranch Association):

- 1) Restrictions on whether or when I can rent my house.
- 2) There is no proliferation of short term rentals in Sea Ranch (short term rentals have been stable for over 15 years).
- 3) It is not fair or needed for the TSRA to oversee short term rentals to the degree they suggest and charge a yearly fee as well.

Most importantly there has been no analysis of the effects of the proposed restrictions. The TSRA has conducted no study, engaged no consultants, and offers no opinion on the expected impacts of the proposed restrictions.

More control/restrictions by TSRA will not make short term rentals better. They will only make things more complicated for all owners while not fixing “problems” that do not exist in the first place.

Thanks for your time,

Kyle Spain  
37067 Schooner Dr.  
The Sea Ranch

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**From:** [Lars Thorsen](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Subject:** The Sea Ranch proposed rental restrictions would cause sever economic damage  
**Date:** Wednesday, July 21, 2021 10:55:55 PM

---

## EXTERNAL

Dear planning commission,

The Mendocino and Sonoma coast communities are highly dependent upon tourism. Tourism brings revenue and jobs to these communities during these very difficult times. Any considerations to imposing restrictions on rentals at TSR should be weighed against an economic impact assessment. My family and I own a home there and we are there frequently. We also do extend our home to short term rentals to offset the high costs of property tax, utilities and HOA dues. The economic damage to my family here would be significant if we were not able to continue to offset these costs.

The job creation which tourism creates on the Somona coast is significant and therefore the subsequent tax revenues also need to be considered. Rentals at TSR are fundamentally not a material issue on the Sonoma coast. The issue which is of paramount concern is affordable housing for the community. While I wish TSR would be the answer for this challenge, it simply isn't as the cost basis of the properties prohibit the economics to work. I would ask the board of supervisors and planning commission to redirect its energy to affordable housing to ensure an economically successful and prosperous community.

Thanks for listening

Lars Thorsen

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**From:** [Greg Ward](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Cc:** [malonsomartinez@tsra.org](#); [karen@amiel-phillips.com](#); [maggiecc@protonmail.com](#); [csjaap@gmail.com](#);  
[mkleeman@tsra.org](#); [nmoran@tsra.org](#); [snevin@tsra.org](#)  
**Subject:** Submission to Sonoma County Local Coastal Plan July 26 2021  
**Date:** Tuesday, July 20, 2021 12:56:19 PM

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## EXTERNAL

Commissioners:

My wife and I own the property located at 36574 Sculpture Point Drive, The Sea Ranch. We purchased the property in 2003 and have enjoyed it as a second home since then. We rent the home as a short term rental through Sea Ranch Escape, which manages the property, addresses any complaints that may arise, and pays the Sonoma County Transient Occupancy Tax on our behalf. Before buying our home we vacationed at The Sea Ranch for decades, taking advantage of the available short term rentals.

The Board of The Sea Ranch Association has submitted to the County a “proposed rule” of the TSRA as a “concept document” for your consideration in the evaluation of a need for a short term rental ordinance. First, it should be made clear that the rule has not been adopted by the Association pursuant to California Civil Code section 4360 and is opposed by a large number of Association members. The Board refused to take a stand on the rule at its meeting of June 26, 2021, voting to table the discussion. The characterization of the proposed rule as a “concept rule” is simply a deceptive means of presenting an unfinished, work-in-process as the final expression of the views of The Sea Ranch owners.

As fully explained by the Submission of The Sea Ranch Hosting Coalition, The Sea Ranch is unique from other short term rental areas in the county by virtue of the fact that it is not a traditional residential community: it has historically been a vacation destination, and the great majority of homes are second homes, with approximately 19 percent of all homes used as short term rentals. The number of short term rentals has not increased over the years – in fact, since 2005 the number of homes used for short term rentals has decreased from 366 to 339. Short Term Rental Task Force Presentation to Board of Directors 4-27-19. The “proposed” rule would be an unprecedented and arbitrary taking of private property. In particular, the rule’s restrictions on the number of days a home may be rented each year, the number of short term rentals available in the entirety of The Sea Ranch, and the proximity of one rental home to another are without any logical underpinning, and unnecessary to resolve issues raised by visitors to the coast.

Indeed, many of the issues and problems addressed by the proposed rule apply equally to permanent residents, who are also capable of disturbing the peace, health, comfort, safety and welfare of the community. For example, there is no justification for subjecting owners of short term rentals to the following requirements and restrictions, while not requiring the same of permanent residents:

1. Reporting the names of all persons living on the property;
2. Restricting occupancy based on the number of bedrooms;
3. Restricting the number of vehicles based on the number of bedrooms, and reporting vehicle descriptions and license plate numbers;
4. Restricting the number of dogs; and

5. Requiring commercial walk-in trash removal.

The owners of short term rentals should be responsible for problems created by renters, just as owners of any home at The Sea Ranch should be responsible for problems created by the occupants. Reasonable regulation is appropriate. But proposed rule 6.7 tramples on property rights, grossly exceeds what is necessary to address any unique problems created by visitors to the community, and opens the door to further micro-regulation that will greatly exceed the scope of the restrictions already in place in the Association's CC&Rs.

I am hopeful the County will be careful to consider the benefits of short term rentals at The Sea Ranch to the vitality of the coast.

Greg Ward

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**From:** [Molly White](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Cc:** [bob.wood@zgf.com](mailto:bob.wood@zgf.com)  
**Subject:** As The Sea Ranch homeowners, we oppose TSRA Model Rule 6.7  
**Date:** Friday, July 23, 2021 11:56:05 AM  
**Attachments:** [image001.png](#)  
**Importance:** High

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## EXTERNAL

Hello, I and my husband Robert Wood, as owners of a home at The Sea Ranch that we make available for short term rentals, we urge the Sonoma County Planning Commission and Board of Supervisors to reject the restrictions in the proposed Sea Ranch Association Model Rule 6.7 and not to delegate the creation of performance standards and/or restrictions to the TSRA Board. We support the position and statements provided by the Sea Ranch Hosting Coalition; we urge the Commission to dismiss the unfair, unnecessary and financial devastating recommendations being developed by a very small minority of TSRA homeowners and protect the rights and needs of the majority.

I would appreciate a response to this email.

Thank you.

Molly White | [Dyne Therapeutics, Inc.](#)  
Vice President, Global Head, Patient Advocacy and Engagement  
830 Winter Street  
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July 26, 2021

Sonoma County Planning Commission  
c/o Gary Helfrich  
2550 Ventura Ave.  
Santa Rosa, CA 95401

*Submitted via email to: [PRMD-LCP-Update@sonoma-county.org](mailto:PRMD-LCP-Update@sonoma-county.org)*

**RE: Local Coastal Plan 2021 Draft Updates**

Dear Commission:

On behalf of Russian Riverkeeper (RRK), I welcome the opportunity to submit these comments for the “Local Coastal Plan 2021 Draft Updates.” The Russian Riverkeeper is a local nonprofit that has been successfully protecting the Russian River watershed since 1993. Through public education, scientific research and expert advocacy, RRK has actively pursued conservation and protection for the River’s mainstem, tributaries and watershed. Our mission is to inspire the community to protect their River home, and to provide them with the tools and guiding framework necessary to do so. For that reason, we submit the following comments.

**I. Current Hydrological Situation in the Russian River Watershed**

Historically, California has been known for its Mediterranean climate with drier summers and mild, wet winters. On occasion there would be a short period of drought conditions as La Niña passed through, or stronger wet years with El Niño. Climate change has caused this once reliable climate pattern to abruptly change in more recent years. Instead, we are now seeing longer hot, dry periods with fewer intense precipitation events during our winter months. Our water infrastructure, water use, and entire mindset around water are not prepared to deal with this new normal. Recognizing and adequately planning for these climate realities in our Local Coastal Plan will go a long way in ensuring that our Sonoma Coast is sufficiently prepared to face these coming changes.

This year the Russian River Watershed has averaged less than 13.5 inches of rain, which is less than 40% of the annual average for the past 30 years. That is on par with the 1976/1977 drought period, and two years into our current dry period we are now dealing with more frequent and hotter temperatures than we did back then. These hotter temperatures increase soil moisture deficits, evapotranspiration rates, and overall demand, while simultaneously reducing groundwater recharge rates and the overall amount of water available to our local ecosystem. Not to mention the increased fire risk and subsequent impacts we regularly face when water is in low supply. This all means that we are in a much worse off place than prior dry years, and we do not know how long this dry period or others will last. Thus, we must be prepared to integrate water protections at every opportunity to protect our invaluable water ecosystems and local human health.



To date, local efforts to reduce demand have been largely inadequate in light of the seriousness of this dry period and demonstrates the need for strong governing policies that require enforceable action. As these dry periods continue to grow in length and intensity our local policies must be proactive in planning for the worst type of water years.

## II. The Water Resources Element

Water resources are finite, and as climate change progresses the water we once had may be no more. Water and rain during the winter months is no longer abundant. As dry periods intensify in both duration and impact, we must acknowledge and prepare for a very different looking water world in the coming decades. Changes in precipitation patterns are expected to result in more intense atmospheric rivers which are not conducive to groundwater recharge, and will make storage a priority. Water uses will also have to fundamentally change so that we remain sustainable as a region, and our collective mindset becomes conservation forward. Through strong demand management policies Sonoma County can be made stronger and be able to provide long-term security to its residents.

It is clear that Staff have spent considerable time re-working the LCP draft so that it more accurately reflects the issues our coastal region faces, and this is much appreciated. However, there are still areas for improvement so loopholes are closed, discretion is removed, and policies are substantiated by strong enforcement action.

Suggestions and considerations we have for strengthening the LCP draft are here:

- **Policy C-WR-1a:** The approval for any project proposed within 200 feet of an impaired surface water shall include as conditions of approval design features and mitigation measures to prevent impacts to the quality of such waters. (New)
  - This policy should be applicable to impaired and pristine waters alike throughout the coastal zone.
  - There should be consideration for hillside projects outside of this 200 foot zone, especially when runoff goes directly to waterways below. A project's location on a hillside above a waterway will result in runoff and negative impacts to the water quality below them. As runoff cuts drainage gullies/channels through the hillside the impacts to the waterways below will only increase through erosion and the amount of water carrying sediment that makes it down the hill.
- **Policy C-WR-1b (4):** Plan, site, and design development to maintain or enhance on-site infiltration of runoff, where appropriate and feasible. Minimize the installation of impervious surfaces, especially directly-connected impervious areas, and, where feasible, increase the area of pervious surfaces in re-development, to reduce runoff.
  - It needs to be made clear whether "feasible" includes consideration of economic cost or not. We highly suggest that it does not allow consideration of economic cost. If cost is so high to mitigate a project sufficiently, then the project needs to either changed, cancelled, or moved to a different location. This is true for use of "feasible" throughout the water resources element.

- **Policy C-WR-11:** Ensure that agricultural operations reduce non-point source pollution through the development and implementation of California Water Resource Control Board-approved ranch plans and farm plans that demonstrate how the applicant intends to avoid, minimize, or mitigate the impact to water quality from agriculture.
  - This policy must also require some demonstration that actions are shown to be effective for that particular site location—that the action will do what it says it will do.
  - This policy also needs expanded to require that there will be no new non-point source pollutants entering the waterways due to use of sufficient BMPs.
- **Policy C-WR-2d:** Encourage public water suppliers to monitor and report groundwater levels, yields, and other information on groundwater conditions.
  - “Encourage” should be changed to “require.” Without necessary data from all water suppliers and groundwater wells, Sonoma County is tying its own hands and preventing informed decision-making that will benefit all of Sonoma County.
- **Policy CWR-4g:** Encourage property owners to incorporate only native, drought-tolerant, and low water use plants to conserve water and reduce the potential for runoff and erosion.
  - Any new development or redevelopment over a certain size must require property owners to use only native, drought-tolerant, and low water use plants to conserve water and reduce the potential for runoff and erosion. Any development or redevelopment project that requires county oversight or a permit should have this provision built into the approval process.
- **General Suggestions:**
  - Across the board, all policies need to make it more clear that once mitigation measures are in a design plan and approved, they cannot be later removed and not completed unless equal or stronger mitigations are used instead. There needs to be an enforceable backstop here so that mitigation plans are not altered insufficiently or removed all together due to costs or some other reason.
  - Policies should not be limited to new development. Instead, they should be inclusive of any redevelopment that disturbs the soil or requires machinery. This is because soil disturbances and use of machinery can compact soil, increase erosion, remove necessary vegetation, and
  - Can it be clarified what “economic life of the development” means?
  - When making references and relying on compliance with other policies and ordinances, it is important that those policies and ordinances being referenced are also updated to reflect today’s water realities. For instance, Sonoma County’s water efficient landscape ordinances have not been updated since 2015. Science, technology, and our overall knowledge about climate change have drastically improved in the last six years so reliance on these ordinances is not sufficient for an LCP that will be in place for the next decade. What we considered a reasonable water use five years ago is not necessarily still reasonable today.
  - Throughout the Water Resources Element there are references and considerations made for water quality, but little emphasis on water quantity. We understand there is some overlap with other LCP elements, but insufficient consideration and

- protections for water quantity is only going to put the Sonoma Coast at risk of being in a position where it is no longer sustainable to live.
- Consideration of public trust resources needs to be part of any analysis, permit determinations, or other decisions relating to actions that have negative impact.
  - Any development or redevelopment project that requires county oversight or a permit should have water monitoring and reporting provisions built into the approval process. Without necessary data from all water suppliers and groundwater wells, Sonoma County is tying its own hands and preventing informed decision-making that will benefit all of Sonoma County.
  - Encourage rain water harvesting, use of grey water, and recycling water. Remove regulatory barriers that do more to prevent these types of water collection.

### **III. The Circulation and Transit Element**

The Sonoma coastline is not known for being an easily accessible place—for public or emergency services—and existing issues are only going to be further exasperated with the effects of climate change. Issues stemming from washed out roads, mudslides, cut-off delivery routes, and reduced access to emergency services all present serious risks to the Sonoma Coast and must be given due consideration so communities are not placed at such high risk, especially as our region becomes more prone to extreme weather events.

Reflecting back on storm events from even 10-15 years ago, we were already seeing days or entire weeks where a single storm would cut off all community access. Though not a complete list, a single storm can mean there are no accessible roads to get to safety, no supply routes for food deliveries or gasoline to get restocked, no hospital access, no phone service for outside communication, and no service workers for downed power lines—the entire community is forced to shut down. For the elderly, disabled, low income, and unexpecting residents or visitors, this is a serious issue that is only going to get worse with climate change. The potential for more frequent and more hazardous flooding throughout the entire coastal zone is high, especially along Highway 1 and Lower Russian River communities.

Additional consideration must be given to improving these access points so residents are not subject to unnecessary risk. To ensure local environmental and cultural resources are not impacted by these improvements, it is important that the local community be involved, necessary repairs to existing infrastructure be funded, and the use of natural erosion and flooding controls be implemented instead of hard barriers. It is also important that any plans for repair or new infrastructure be inclusive of the most recent sea level rise studies so that setbacks are sufficient.

Finally, available public transit is inaccessible to anyone outside of Sea Ranch, Point Arena, and Gualala city limits since the MTA (only public transit to Santa Rosa) picks up in town, and it does not have any routes through nearby rural areas despite a significant portion of Sonoma County's population residing in these areas. Plus, there is only one scheduled trip available per day. As a result, access to local public trust resources is significantly limited for anyone without a car or the funds to drive to the beach for the day.



It would be great to expand public transit routes and schedules so residents can more easily visit Highway 1 and have coastal access. Any route expansions must also coincide with local park areas or walking areas that provide safe haven to pedestrians existing or waiting on transit. Priority for route expansion should be given to lower income and disadvantaged areas along Highway 1, throughout Northern Sonoma County, and connecting to Mendocino county. Expansion of public transit could also help reduce the number of cars coming to the coastal area and reduce related impacts like increased carbon emissions.

#### **IV. The Cultural and Historical Resources Element**

When consulting on areas of cultural and historical significance in Sonoma County and for related resources, it is important that local tribes are included. This means through all stages, from beginning to end, and this is especially true for lands and resources that historically belonged to local tribes.

For example, under Policy C-CH-1b development permits involving the Historic Resource Survey are to be referred to the Sonoma County Landmarks Commission for review and mitigation. Such development permits should also require consultation by local tribes when relevant in location, cultural significance, or physical site. Sea Ranch should be subject to the same consultation with local tribes. Management of our region's coastal areas has a long history of colonization and land domination, and that must be recognized and acknowledged in Sonoma County's actions and policies going forward.

#### **V. The Public Access Element**

The Russian River, our local beaches, and navigable waterways are all public trust resources that are meant to be publicly accessible. In recent years though, through privatization and glamping businesses, many of the points of access to these public trust resources have been closed off. Sonoma County should focus on limiting this privatization and encouraging the use of public easements to protect these public access points.

Along with the need for easily accessible public access points is a need to keep our public trust resources clean and in their natural state. Policy C-PA-3o helps provide for some of this, but is limited to only the "major" facilities. There is also little detail on the monitoring and oversight of these facilities. To truly protect our resources there has to be sufficient trash receptacles and waste facilities to last a tourism-packed weekend, as well as staff to help empty and maintain those facilities.

#### **VI. Conclusion**

Society must be willing to adapt and take significant steps forward now to effect necessary changes. This means our governing policies have to be designed and written to help further these changes in mindset. We appreciate the opportunity to provide comment and welcome any questions that you may have.



Sincerely,

A handwritten signature in black ink, appearing to read "Jaime Neary".

Jaime Neary  
Staff Attorney  
Russian Riverkeeper

A handwritten signature in black ink, appearing to read "Don McEnhill".

Don McEnhill  
Executive Director  
Russian Riverkeeper

A handwritten signature in black ink, appearing to read "Ariel Majorana".

Ariel Majorana  
Environmental Justice Outreach Specialist  
Russian Riverkeeper

**From:** [Bob Neale](#)  
**To:** [Denny Van Ness](#); [Shanti Edwards](#); [Eamon O'Byrne](#)  
**Cc:** [cindyeggen@me.com](#); [eric@cety.us](#); [zucconnonie@gmail.com](#); [Steve Ehret](#); [Bert Whitaker](#); [Gary Helfrich](#); [Eric Koenigshofer](#)  
**Subject:** RE: Trailhead and LCP  
**Date:** Tuesday, September 14, 2021 5:13:28 PM

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## EXTERNAL

Dear Estero Neighbors,

I'm sorry that you are disappointed with SLT's decision to not request removal of the K2 point from the draft LCP. I hear the frustration in your email. While SLT remains committed to the process of improving neighborhood relationships through our ongoing dialogue, I think it is important to underscore the differences between SLT's role in managing our Estero Americano Preserve and our role with the Local Coastal Plan update. As a landowner, we have control over what activities occur on our lands, what we write in our management plans, how we communicate our mission. These are the topics and issues that we have been discussing with you within the context of our Easement Agreement and neighbor relations. But that's not the case with the Local Coastal Plan. That effort is led by Sonoma County and the Coastal Commission to implement the California Coastal Act. SLT doesn't have a formal role or any authority in this process. We interact with it as other private landowners and nonprofits do through the public review process.

I have done some additional outreach and research regarding the Local Coastal Plan update and your concerns. As we know, K2 is located on our Preserve and is identified on map C-PA-1k as an "Access Point/Trailhead." I read this as meaning it is either an Access Point or a Trailhead. In this case, clearly it is an Access Point, not a Trailhead. The narrative in the draft LCP correctly identifies our Estero Americano Preserve as a place where the public can access the coast via SLT's limited guided activities. Section 27.1 and 27.2 of the draft LCP clearly and accurately explains this use. On page 116, it states that "the Sonoma Land Trust ... owns property adjacent to the Estero Americano. At this point public access is limited to tours and interpretive programs." On Page 89 of Appendix B of the draft LCP, there is further language describing that "access is only through infrequent scheduled guided outings available to the public." In addition, SLT has received significant public funding to protect lands adjacent to the Estero and to conduct the activities as described above. The description of K2 is consistent with how we have managed the Preserve in the past and are using it at present relative to public access. From our perspective, there just doesn't seem to be grounds to request moving it from the map.

In contrast, the point on the Marin side of the Estero you referred to was removed from the map because Sonoma County doesn't have jurisdiction over lands in Marin County. We were not involved in that decision, but it is obviously a very different circumstance than that of K2. If you still think there is an error with the LCP, either on the map or in the narrative, please contact the County and let them know. Otherwise, it seems best to let the LCP process continue and provide input through the existing public review process.

As we said in our recent meeting, SLT's plans are to continue with limited, guided activities for the



public (SLT members, students, volunteers, and the community) as we have been doing for many years. We will continue to honor the terms of our Easement Agreement. We will continue to manage the natural resources and infrastructure in a responsible fashion. We share your concerns about trespassing and vandalism. We will do our part to prevent trespassing and vandalism, provided that we do not limit any legal rights the public has to access the coast or Estero Americano. And we will continue to work in good faith with you to find mutually acceptable ways to enjoy this amazing land that we have the good fortune to live on and/or manage.

Best,  
Bob



**Bob Neale** *Stewardship Director*  
**Sonoma Land Trust**  
He/Him/His  
822 Fifth Street, Santa Rosa, CA 95404  
Cell (707) 391-3732  
[www.sonomalandtrust.org](http://www.sonomalandtrust.org)

[\*Be A Force for Nature! Learn more\*](#)

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**From:** Denny Tibbetts <tibbsx4@comcast.net>  
**Sent:** Tuesday, September 7, 2021 1:09 PM  
**To:** Bob Neale <bob@sonomalandtrust.org>; Eamon O'Byrne <eamon@sonomalandtrust.org>; Shanti Edwards <shanti@sonomalandtrust.org>  
**Cc:** cindyeggen@me.com; eric@cety.us; zuccononnie@gmail.com; Steve.Ehret@sonoma-county.org; Bert.Whitaker@sonoma-county.org; Gary Helfrich <Gary.Helfrich@sonoma-county.org>; eric.koenigshofer@sonoma-county.org  
**Subject:** Re: Trailhead and LCP

Dear Bob and Sonoma Land Trust,

We are very disappointed with your conclusion of the month long investigation of the LCP public access/trailhead designation on your property - "Sonoma Land Trust does not think it is necessary to ask the County to remove this point from the map". This non existing trailhead is shown on your property and is displayed on public websites. There are no easements or neighbor permission to allow such access. You say it is unclear who suggested the location for the trailhead. It took me one call last November to get this information confirmed. Gary Helfrich, planner with the county told me that it is Regional Parks who is responsible for creating the LCP public access maps and advised us to

deal directly with them. Have you done that? The access point is on your property - it is your responsibility to correct this non-existent trailhead designation. You also suggest that there is not a clear mechanism to bring about this correction. You are wrong - Marin County was successful in having the original K-4 designation on Valley Ford Rd Estero Rd. removed. I am cc'ing contacts from Regional Parks, Sonoma County Planning Department and Commission who can assist in the map correction.

We believe you have the ear of the county and this issue needs to be dealt with. In order to get to the K-2 point, the public would have to cross private property - the property of the six neighbors you sat at a table with on August 6th and told - you have NO future intention to have public access, and claimed no knowledge of the trail placement on property. There is no easement or permission to allow this. This map will be confusing to the public and is an open invitation to trespassing. You are well aware of trespassing and vandalism problems that have occurred. At a time when you claim to be trying to build neighbor relations, you are sending us a clear message - this response is not indicative of being a good neighbor. We respectfully request that you reconsider your position.

Regards,

Estero Lane Neighbors

Sent from my iPad

On Sep 3, 2021, at 5:09 PM, Bob Neale <[bob@sonomalandtrust.org](mailto:bob@sonomalandtrust.org)> wrote:

Dear Estero Lane Neighbors,

I've done a little investigating into the issue of the Trailhead that the draft LCP has located on Sonoma Land Trust's Estero Americano Preserve. I'm not positive who suggested that location for a trailhead, but it was not Sonoma Land Trust. I have reviewed the LCP map that shows the Trailhead, and others along the Estero, and I have done some further investigation. It is my understanding that the County views this Trailhead and other points on Figure C-PA-1k as a general designation of desired public access points. It doesn't change any existing property rights. It also does not require that a trailhead be built here, nor indicate any permission to do so. No obligation or requirement appears to be created. Given that the LCP is a broad County planning document and incorporates a process for broad community input, whether for or against any parts of the plan, Sonoma Land Trust doesn't think it is necessary for us to ask the County to remove this point from the map. It isn't clear that there is a mechanism to do this anyway.

As we discussed, Sonoma Land Trust has no current plans for developing a public access point or trailhead at that location. We are not in discussions with any County agency to develop a trailhead there. We understand and respect the private property

rights of our neighbors and other landowners along Estero Lane as we do the County's process for updating the LCP. Any future support or opposition by SLT for the actual siting or construction of a trailhead on the Preserve will be dependent upon the actual plan and circumstances at that time, including the input of our neighbors. However, we are not aware of any current efforts for such a trailhead at this time.

Denny, thanks for bringing this issue to our attention, I wasn't aware of it. I look forward to talking to you all soon.

Best,

Bob

<image001.jpg>

**Bob Neale** *Stewardship Director*  
**Sonoma Land Trust**  
He/Him/His  
822 Fifth Street, Santa Rosa, CA 95404  
Cell (707) 391-3732  
[www.sonomalandtrust.org](http://www.sonomalandtrust.org)

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**From:** [Laura Trombley](#)  
**To:** [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)  
**Subject:** Keep Sea Ranch Open  
**Date:** Monday, July 26, 2021 1:02:29 PM

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**EXTERNAL**

I am writing you to ask that you to reject the restrictions in the proposed Rule and not to delegate the creation of performance standards and/or restrictions to the TSRA Board. There are already many restrictions when it comes to Sea Ranch property and these restrictions would benefit only a few full-time residents who can afford to live here full time. This is elitist and would also hurt the local economy. I want to retire here and am very particular about any individual who comes to rent my property. Creating more rules to benefit the few is disappointing and against any fair standard.  
Laura Trombley

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*Life changes fast. Life changes in the instant. Joan Didion*

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**From:** [Kristen Haring](#)  
**To:** [PRMD-LCP-Update](#)  
**Cc:** [Chris Jaap](#); [Jennifer Merchant](#); [Neil Moran](#); [R Holmes](#); [crista lucey](#)  
**Subject:** comments on Sonoma LCP Public Review Draft  
**Date:** Thursday, July 22, 2021 3:36:11 PM

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## EXTERNAL

22 July 2021

We would like to take this opportunity to address a few provisions of The Sonoma Local Coastal Plan Revised Public Review Draft (LCP) that conflict, or create tension with, the LCP's express and repeated goal of promoting coastal access and visitor-serving recreational uses. The provisions, all contained in the Open Space and Resource Conservation Element, should confirm that human access for passive recreation is possible – and is, in fact, protected – even within areas that are habitats for marine mammals and seabirds. Such clarification is necessary because the entire Sonoma County coast could be described as such a habitat.

Policy C-OSRC-5b(1) (regarding environmentally sensitive habitat) states in subpart (4) that “[a]reas that contribute to the viability of plant and animal species for which there is compelling evidence of rarity” are considered environmentally sensitive habitats. “Compelling evidence of rarity” is an uncertain, purely subjective standard that provides no guidance. It undermines the clear standards established in the policy's first three subparts, and will spawn disputes regarding whether there is sufficient evidence of rarity.

Policy C-OSCR-5e(3) (regarding marine habitats) states that “[p]ublic access to offshore rocks and onshore nesting/rookery areas used by seabirds to breed or nest or which provide habitat for seals and sea lions shall be prohibited.” By addressing bird-nesting and seal-rookery areas with a single slashed phrase, the policy could be misconstrued to prohibit access to all areas that “provide habitat for seals.” That would result in a prohibition of access along the entire Sonoma County coast. A clearer statement should be made by using separate clauses, such as: “Public access shall be prohibited to offshore rocks and onshore areas while seals and sea lions are using them as rookeries, and to offshore rocks and onshore areas while seabirds are using them to breed or nest.”

Similarly, Policy C-OSCR-5e(5) (regarding marine habitats) states that “[d]isturbance of marine mammal haul-out grounds shall be prohibited and recreational activities near these areas shall be limited to passive recreation [and] [d]isturbance of areas used by harbor seals and sea lions shall be avoided.” This provision is overbroad and, again, contradicts the LCP's public-access goals. By failing to define “disturbance” and “passive recreation,” the provision could be misconstrued to mean that human activity near a haul-out ground is prohibited.

Finally, Policy C-OSCR-5e(6) (regarding marine habitats) encourages the California Department of Fish and Wildlife to monitor marine mammal haul-out grounds annually “to determine their condition and level of use by marine mammals” and “to incorporate this information into its management plan for marine mammals.” These provisions should acknowledge that there are numerous suitable haul-out grounds that marine mammals can and do use, and the number of such grounds in an area reduces the need to prohibit human activity on the relatively few accessible beaches.

Thank you for inviting comment, and for considering the comments made here.

Sincerely,  
Kristen Haring  
Roxanne Holmes  
Crista Lucey  
The Sea Ranch

cc

Chris Jaap, board liaison to LCP Working Group, The Sea Ranch Association  
Jennifer Merchant, community manager, The Sea Ranch Association  
Neil Moran, board chair, The Sea Ranch Association

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## COMMENT 87

**From:** [Chelsea Holup](#) on behalf of [PlanningAgency](#)  
**To:** [Gary Helfrich](#)  
**Subject:** FW: Coastal PAn (Public Comment)  
**Date:** Friday, October 01, 2021 3:45:10 PM

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**From:** Rick Coates <[rcoates@sonic.net](mailto:rcoates@sonic.net)>  
**Sent:** October 01, 2021 3:34 PM  
**To:** PlanningAgency <[PlanningAgency@sonoma-county.org](mailto:PlanningAgency@sonoma-county.org)>  
**Subject:** Coastal PAn

### EXTERNAL

Policy CT-3f in the transportation section of the proposed Coastal Plan is insufficient to prevent increases in GHGs and VMTs. History has shown that this kind of language will be used to permit approval of projects that actually increase GHGs and VMTs. It will be impossible to predict if any of the auto traffic will be diverted to bicycles. Nor will it be possible to quantify in advance of project approval the amount of GHGs and VMTs avoided. It is doubtful that bicycle trails and facilities will be sufficient to eliminate increases in GHGs and VMTs.

It should be policy to provide these facilities quite independent of their effect on GHGs and VMTs.

If the County is serious about climate change (for which there is little tangible evidence), the County will simply prohibit projects that increase GHGs or VMTs.

[Policy CT-3f: Revise County Traffic Guidelines to require that traffic studies identify impacts to existing and planned bicycle and pedestrian facilities. Consider development of bicycle and pedestrian facilities as mitigation measures for projects generating additional vehicle miles travelled and greenhouse gas emission impacts. \(GP2020 REVISED\)](#)

Rick Coates  
Executive Director  
EcoRing  
Promoting **EcoTourism and Green Travel**.  
[It's the Journey not just the Destination!](#)

707-632-6070 or [rcoates@sonic.net](mailto:rcoates@sonic.net)

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October 6, 2021

Via Email: [PRMD-LCP-Update@sonoma-county.org](mailto:PRMD-LCP-Update@sonoma-county.org)

Permit Sonoma  
Cecily Condon, Lead Planner  
Gary Helfrich, Project Planner  
PRMD-LCP-Update  
2550 Ventura Avenue  
Santa Rosa, CA 95403

Dear Ms. Condon and Mr. Helfrich:

Thank you for the opportunity to provide comments on the Sonoma County Local Coastal Plan Update ("LCP") and the zoning regulations associated with the Plan. Sonoma Land Trust (SLT) supports the Draft LCP and its balanced focus to protect the natural and cultural resources of our extraordinary coast while supporting the public's right to access the coast in an appropriate manner.

SLT has acquired, protected, and managed thousands of acres of coastal land since our founding in 1976 via conservation easements and land ownership. We have transferred many of these lands—including the iconic Red Hill and Jenner Headlands properties—to parks or other nonprofit organizations in order to provide expanded public access opportunities, protect natural and cultural resources and to showcase the compatibility of working landscapes and public recreation. SLT has provided guided hikes, volunteer days and educational opportunities to thousands of visitors on these lands over the decades, and we have focused considerable effort on stewarding these natural lands for native biodiversity and sensitive habitats.

SLT is pleased to see the "*preservation of natural resources ... outdoor recreation ... and the preservation of archaeological, historical, and cultural resources*" and the protection of Environmentally Sensitive Habitat Areas (ESHA) as core principles of the LCP. Sonoma Land Trust supports the County's commitment to preserve and expand appropriate public access and use of the coast for all Californians. As the Coastal Act clearly states it is "*essential to the economic and social well-being of the people of this state and especially to working persons employed within the coastal zone.*"

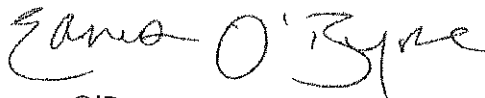


## COMMENT 88

In terms of specific suggestions, the Public Access Element FIGURE C-PA-1k (SubArea 10 Valley Ford) correctly identifies SLT's Estero Americano Preserve as a point of public access because we provide limited guided activities and environmental educational opportunities. Because the Estero Americano Preserve is not currently open for unguided public access and is surrounded by many private residential and ranching properties, we would recommend that it would be clearer if the maps denote whether or not a public access point is actually on public or private lands. For example, using a different color designation such as yellow for Point K2 to denote a public access point on private land or green for locations such Point I-30 on map FIGURE C-PA-1j (SubArea 9 Bodega Bay Vicinity) on public land, would help the public and private landowners better understand potential limitations and differences between these access points.

We appreciate the careful consideration and balancing of multiple interests in the coastal zone. This is not an easy task, but it is critically important, and we commend Sonoma County for continuing to protect our treasured coastline and its rich ecological resources and cultural heritage for generations to come.

Sincerely,

A handwritten signature in black ink that reads "Eamon O'Byrne". The signature is written in a cursive, flowing style.

Eamon O'Byrne  
Executive Director

## **To the members and staff of the Sonoma County Planning Commission**

The Sea Ranch Hosting Coalition is a group of over 230 Sea Ranch owners (and some frequent renters) who support reasonable regulation of short-term rentals in the coastal zone but oppose the kinds of restrictions called out in the Sea Ranch Association's Model Rule 6.7. The coalition also includes a number of owners who do not currently rent their homes but are concerned that they may lose the ability to do so in the future. It exists as a direct result of the adoption of the Model Rule by the Sea Ranch Board on May 22. The Rule was submitted to Sonoma County as input for your consideration as you move towards developing performance standards for short term rentals.

We believe that short term rentals in the coastal zone provide affordable public access, particularly at Sea Ranch which is a mixed second home, short term rental and residential community. The Sea Ranch Board does not appear to be planning to reduce the availability of short-term rentals on the development below historical levels.

Since the Association Board is now on public record as committing not to pursue regulatory approval to implement Model Rule 6.7 on the Sea Ranch, we do not need to take up more of your time now on short term rentals. We anticipate that when the County proceeds to develop ordinances to implement performance standards for short term rentals in the coastal zone we will have the opportunity to provide input and comments.

We do have some concerns about the Association's input to your commission for the October 7 meeting. While we support the Association's position on ESHAs we are concerned about its suggestion to add the words "community character" to the reasons for STR land use policies. Without qualification, "community character" can be a highly charged term with a very subjective interpretation. It has been used elsewhere in the past as a Trojan horse for implementing discriminatory housing policies. We believe that the County should limit any short term rental restrictions to the environmental reasons already proposed.

The Hosting Coalition shares the general concern about the absence of adequate employee and affordable housing on the coast. We stand ready to

work on solutions to this intractable problem. However, the Sea Ranch Association's desire to add "housing" as a reason for STR land use policies on the ranch ignores the fact that there is no set of circumstances where a reduction in short term rentals would result in greater, or indeed any, availability of affordable housing. With the median Sea Ranch real estate prices well in excess of \$1 million, this is economically unrealistic. Solutions to the housing challenge will need to be developed outside the Sea Ranch.

Please accept this document as input for your consideration at your October 7 Planning Commission meeting. We look forward to working with you and your staff as this process moves forward.

Our website at [www.TheSeaRanchHostingCoalition.org](http://www.TheSeaRanchHostingCoalition.org) offers more information about our positions and membership.

2022-01-12 Carol Sklenicka

Land Use Element LCP draft, Carol Sklenicka, Jenner CA carolsklenicka@gmail.com

p. 2-3 notes fast growth of vacation rental industry with now 550 residences registered and I would guess twice that many or more actually serving this function. So impact of these visitors is a primary concern

p. 3 also notes construction of new residential units – are any full-time residences? What is their impact?

p. 2-3 do not understand population projections: 3359 for 2023 on page 2; BUT 11,700 on page 3 with 3283 new residents!

The population in the Coastal Zone was 3,690 and 3,385 residents in 2000 and 2010, respectively (U.S. Census). The population estimates for 2018 and 2023 are 3,427 and 3,359 residents (Permit Sonoma GIS Community Profile).

The Sonoma County General Plan 2020 Land Use Element for the Sonoma Coast planning region projects 3,283 new residents resulting in a total population of 11,700 by 2020 for the entire planning area, including inland portions.

p. 5 This sentence needs some punctuation—does not make sense:  
The Local Coastal Program contains 13 base zone districts twelve land use categories in five general use categories.

p. 19 Commercial Tourist Areas

I think Jenner is already at its maximum for lodging with River's End and Jenner Inn and numerous registered and unregistered vacation rentals. Also, parking is already at a premium. No new lodging should be permitted. New retail or restaurants would also increase already existent problems with air pollution and parking, as well as impact on local services.

Development in Jenner and Goat Rock is restricted by limited water supply. The Jenner Water System cannot support any more development. As noted on page 50 of this document, "Served by a mutual water system, there is a moratorium on water hookups due to inadequate water supply." ["there is" should be replaced by "Jenner has" to remedy dangling modifier and resultant lack of clarity in this sentence.]

Full-time local residents are impacted by the number of visitors who occupy vacation rentals. Vacation renters tend to use water with abandon (statistics should be gathered on this) and make it expensive for full-time residents to live here.

Restrictions on development should be strictly maintained and efforts should be made

to encourage full-time affordable housing instead of tourist facilities.

p. 21 Criteria

I am concerned that these criteria are not adequate to prevent development of vineyards in agricultural lands; also concerned that vineyard development could lead to visitor-serving commercial uses.

p. 22 Criteria for Commercial Services

2) Any promotion of vacation rentals or lodging for visitors is ipso facto a reduction of opportunities for affordable or workforce housing.

4) “The amount of land designated for local-serving commercial uses shall be consistent with the population projected for the local market area.” Two different projected population numbers are given on pp. 2-3. Additionally it’s a difficult standard to apply when they are many second homes.

p. 25 Permitted uses on Rural Residential lands: restriction so **single family residential** use should be defined to limit vacation rental use. Suggest vacation rentals be limited to 20 weekends or 100 days a year—or less if possible. The category of single family residence is a misnomer if dozens of families are rotated through the same house every year. Suggest that through the MAC the coastal communities could recommend an appropriate restriction of vacation rentals. Limiting vacation rentals would increase affordable housing for full-time workforce residents.

p. 48 “The California Coastal Act of 1976 encourages providing support facilities for visitors to the coast, especially those available to the public at a moderate cost.” This statement needs to be updated. The Sonoma Coast is already at carrying capacity; additional visitors will have a detrimental impact on preservation of resources and sensitive habitats. Suggest we look to other counties’ LCPs for ways to PROTECT while still allowing public access. The fact that (as stated on same page) Jenner is unincorporated makes it vulnerable to poorly reviewed development. Can the MAC become a body for local review?

p. 50 “Additional inns, hostels, or similar facilities would be in keeping with Coastal Act policies which encourage visitor-serving facilities in existing developed areas. Served by a mutual water system, there is a moratorium on water hookups due to inadequate water supplies.” Additional visitor-serving facilities would be a problem for Jenner. We need to state clearly that water and septic are not the only limitations.

p. 51 Bridgehaven is privately owned. Unclear what is meant by efforts to acquire public access.

p. 52. Chart lists 21 lodging/motel rooms in Jenner. Please note that cottages that are part of Jenner Inn are essentially vacation rentals, which means they have displaced

housing for full-time workforce residents.

p. 53 **Policy C-LU-6a:** “Encourage the development and expansion of visitor-serving and local-serving commercial uses within urban service areas and rural community boundaries where water supply and wastewater disposal requirements can be met.” As stated elsewhere, I do not think there should be any encouragement or expansion of visitor or local facilities in Jenner. To expand would imply that you are going to allow water to be trucked in and waste to be trucked out – which would have negative consequences for traffic and other public services and parks.

**Policy C-LU-6b:** Limit new visitor-serving commercial development to areas within designated urban service areas and rural community boundaries **except for the lowest intensity development** (i.e., guest ranches, and bed and breakfast inns, vacation rentals, and agricultural farmstays). The listed items are NOT low-intensity!!! How is this low-intensity measured? These terms need to be carefully defined and limited.

p.54 **Policy C-LU-6c:** Provide public restrooms and drinking water facilities where needed and appropriate as part of visitor and local-serving commercial development. **(Existing LCP Revised)** Jenner currently had NO public restrooms except port-a-potties which are provided by state parks at Visitor Center, by post office, and by privately owned gas station. How is this provision to be squared with water restrictions?

**Policy C-LU-6d:** “Consider modest scale expansion of existing visitor-serving and local-serving commercial uses outside of urban service areas and rural community boundaries where water supply and wastewater disposal requirements can be met.” What does this mean???? “can be met” is very ambiguous and would seem to open a loophole for water to be trucked in / waste to be trucked out. Statement needs to be clear.

p. 55 **Policy C-LU-6o:** “Encourage a modest infill of visitor and local-serving commercial development in Jenner if water supply and wastewater treatment and disposal requirements can be met.” This statement is troubling because of ambiguous reference to water and waste treatments! Met how? See previous remarks.

GENERAL OBSERVATION: Given the limitations on responsible building, the looming issues of climate change, and the already overwhelming impact of tourism on local residents and local environment, it seems like a limitation on VACATION rentals would be the best way to protect our environment and increase affordable housing for full-time residents who make up our workforce and maintain our communities and do the volunteer work that makes our parks attractive for all.

On a related note, every effort should be made to restrict any form of viticulture in the coastal zone. Grape-growing needs to be separated from agriculture.

# Parcel-Loading As Fringe Development

By Ernie Carpenter, Sebastopol, Ca.

Since adoption of the 1978 General Plan (GP), Sonoma County has planned for community-centered growth. Development has been directed to communities that have sewer and water. The cities take most of the County's growth. During the 1980s, this was planned between Supervisors, City Councils and citizens. The Association of Bay Area Governments allowed County housing shares to be directed to cities instead of subdividing farmland.

The idea was to save large lots for agriculture and to relieve the costly stresses of urban growth. When the apple industry folded, apple farmers expected to cut their land into five-acre parcels as a retirement plan. The County preserved this agricultural land through large lot zoning. This is also true of forested land. This strategy worked to preserve the land for open space and agriculture. An important tool was the creation of Burbank Housing to build affordable housing for the lower end of the economic spectrum. Unfortunately, the Supervisors have under-utilized and under-funded Burbank Housing.

Fringe development has taken on new meaning in Sonoma County. "Leapfrog" development and small parcels are less of a growth issue. Fringe development looks like huge corporate-owned wine processing facilities, with restaurant and curlicue stores added. There is a various assortment of housing now allowed by the County Supervisors on each parcel. This not only impacts services, habitat, and creates greater traffic, it is costly to the government. We now have housing complexes in agricultural zoning due to parcel loading.

There is gentrification in Sonoma County, just like in well-studied West Marin. Fewer locals can afford new rural housing. Real estate is not geared to the service or agriculture worker but toward people leaving the City and the well-heeled. The Board believes they can "build their way out of this housing crisis". Will not happen on twenty-bucks-an-hour wages. Universities and high schools are now trying to pay for housing for teachers. Fringe housing leads to more gentrification and solves nothing.

Sprawl costs are well documented. Sonoma County maintains double the miles of public roads as any comparable-sized County. The Board did not recognize water-scarce areas, fire-prone areas nor dispersed service costs in the densification of properties. When services are dispersed, law enforcement and firefighting costs go up. Every year the Board fights the financial cost of increasing the Sheriff's patrol. The stress on fire services are well-documented. Given the yearly wildfires, it hardly makes sense to disperse housing in forested areas. The Board did not create an exception in forested area for parcel loading. They resisted California Department of Forestry efforts to disallow commercial development on roads less than twenty feet wide. This decision is unbelievably foolish.

A topic for another day is the Vacation Rental Ordinance. The Board is finally realizing that there is a downside to vacation rentals. Returning vacation rentals to permanent housing would solve most of the housing crunch we are now experiencing. We need a further curtailment of vacation rentals.

Today, sewer areas cannot take more growth due to capacity issues. We need sewer upgrades if we plan to increase density. The County must caucus with Santa Rosa and the Association of Bay Area Governments to ensure that affordable housing growth can be transferred to cities. The County can



spend its housing money in incorporated areas. Consider curtailing the corporate farm factories now labeled wineries. Support Santa Rosa's efforts to build higher. It is as valid today as twenty years ago that curtailing rural development is more efficient in saving farmland while saving the budget. Providing new housing in the cities is the direction forward.

## **Agriculture**

**(Please note mis-numbering of pages in this Element)**

### **Page AR-2, 2.1, FARMLAND IN THE COASTAL ZONE**

**Comment:** There is no explicit mention of the Williamson Act and Agricultural Preserves in this section.

**Recommendation:** [Here is suggested language from the 2008 LCP:](#)

"Many landowners in the Sonoma coastal zone have demonstrated a commitment to agriculture by entering into Williamson Act contracts. The California Land Conservation Act of 1965 (the Williamson Act) allows counties to establish agricultural preserves and thereby give tax reductions to landowners engaged in commercial agricultural operations. Under current law, lands under contract are appraised by the county assessor for their agricultural productivity rather than market value. When an agricultural preserve is formed, State law requires all lands in the preserve to be zoned to prevent land uses incompatible with agriculture within the preserve. In signing a contract with the County, the landowner agrees to retain his land in agricultural uses for at least ten years."

### **Page AR-4, 4.1 RESIDENTIAL SUBDIVISION POTENTIAL**

**Comment:** What does **RESIDENTIAL SUBDIVISION POTENTIAL** mean? This header implies that Ag land will be converted to residential subdivisions, in contradiction to Page AR-2, 1.1 PURPOSE: "The California Coastal Act protects productive resource lands, including agricultural lands, and establishes agriculture as a priority use and emphasizes the retention of agricultural land in production."

**Recommendation:** [Please directly cite Coastal Act Section 30222:](#)

"The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over **agriculture** or coastal-dependent industry."

“Complaints about noise, odors, flies, **spraying of pesticides**, and similar nuisances related to agricultural practices may discourage and sometimes prevent farmers from managing their operations in an efficient and economic manner.”

**Comment:** Pesticide applications are not necessary to efficient and economic agricultural operations. Witness the burgeoning market for organic products and the public and environmental health risks of pesticide application. Their use in the Coastal Zone is inadvisable altogether, due to both human and biotic impacts such as pollinator, bird and mammal by-kill.

**Recommendation:** **Please omit “spraying of pesticides”.**

**Objective C-AR-1.1:** “**Avoid** the conversion of agricultural lands to residential or non-agricultural commercial uses.”

**Comment:** “Avoid” is too weak a word to use in the context of Ag land commercial uses.

**Recommendation:** **Please change the word “avoid” to the word “prohibit”.**

**Policy C-AR-1a:**

“The following criteria shall be used for approval of subdivisions on designated Land Extensive Agriculture or Diverse Agriculture:

(b) agricultural conversions shall be limited and evaluated **on a case-by-case basis.....”**

**Comment:** As has been seen in the costly and contentious 5-year struggle to create a Sonoma County Winery Event Ordinance, lack of clear criteria for application permitting, administered on a case-by-case basis, leads to unnecessary expenditure of County time and effort as well as public conflict.

**Recommendation:** **We strongly recommend outlining specific criteria for agricultural conversions in this LCP Update for public review, in advance of its presentation to the Board of Supervisors.**

**Policy C-AR-1b:** “**Subdivisions on designated resource and agricultural lands shall be permitted only for development related to the pursuit of either agriculture or forestry, as appropriate;** and only with mechanisms such as open space or agricultural easements to ensure the long-term protection of agriculture and resource production. (EXISTING LCP REVISED)”

**Comment:** Objective C-AR-1.2 and the Policies which follow express intent and detailed plans, at the discretion of Permit Sonoma, to convert agricultural land in the coastal zone to residential subdivisions. Even with the proviso that they..... ”shall be permitted only for development related to the pursuit of either agriculture or forestry, as appropriate”, there is no clear definition of the word “appropriate” or specific examples of what those pursuits would be. Since agricultural product promotion is deemed essential to agricultural profits in Sonoma County, it is logical to assume that there would be more visitor-serving commercial uses of agricultural lands in the Coastal Zone, such as promotional events, as a result.

**Recommendation:** **We strongly recommend that Objective C-AR-1.2 and Policies C-AR-1a and 1b be struck from the LCP Update entirely and replaced with specific criteria for subdivision permitting, as stated above.**

## **Page AR-6, PROTECTION OF AGRICULTURAL LAND**

**GOAL C-AR-2:** “Maintain agricultural production by **limiting intrusion of urban development on agricultural land.**”

**Objective C-AR-2.1:** “**Limit intrusion of urban development in agricultural areas.**”

**Comment:** “Limit” implies intention to permit urban intrusion in agricultural lands. Even with conditions, this is contradictory to the Coastal Act and contradicts the previous rhetoric of **PROTECTION OF AGRICULTURAL LAND.**

**Recommendation:** **Replace the word “limit” with the word “prohibit”.**

**Objective C-AR-2.3:** “**Limit extension of sewer and other urban services** beyond the Bodega Bay Urban Service Area Boundary and Rural Community Boundaries.”

**Comment:** “Limit” again implies intention to permit extension of sewer and other services, presumably water, beyond the Bodega Bay Urban Service Area Boundary and Rural Community Boundaries. The Coastal Zone is a Class 4 Water area and drought is the new normal.

**Recommendation:** **Change the word “limit” to the word “prohibit”, or drop this Objective and any other language promoting public services outside of urban or rural community boundaries, save for failed septic systems that pose a public health risk.**

**Policy C-AR-2c:** “Extension of urban services.....shall be limited to....solve existing health and safety problems, **unless allowed by the Public Facilities and Services Element** or Policy C-AR-7b (aquaculture).”

**From Public Facilities and Services, Policy C-PF-2a:** “In areas with limited service capacity, **new development for a non-priority use, including land divisions, not specified above, shall only be allowed if adequate capacity remains for Coastal Act priority land uses.**”

and **Policy C-PF-2e(4):** “**Use agreements, covenants and zoning to limit the growth inducement potential of extension of public sewer services.**”

**Comment:** These policies are essentially providing for new development for non-priority uses outside of urban and rural community boundaries by extension of water and sewage services. There is no definition of “adequate capacity” remaining for Coastal Act priority land uses. The use of “agreements, covenants and (pending) zoning is not defined, specific nor enforceable.

**Recommendation:** **Change Policy C-AR2c by dropping the words: “....unless allowed by the Public Facilities and Services Element or....”.**

**Policy C-AR—3a: “.....and spraying of chemicals.”**

**Comment:** “Spraying of chemicals” does not specify what type they may be, (eg, copper sulfate, synthetic pesticides, hormones or fertilizers). There are differences between the public health effects of various sprays.

**Recommendation:** Please specify the types of chemical sprays being referred to and expressly exclude the spraying of pesticides or application of rodenticides in the Coastal Zone.

**Page AR-8, 4.3 AGRICULTURAL SUPPORT USES****Vineyards and Wineries in the Coastal Zone (margin)**

**Comment:** The overarching theme of this aside is one of reassurance that there have never been wineries in the Coastal Zone for a variety of reasons. However, it is noted that “**there are wineries within a mile of the Coastal Zone**” and that “**a Coastal Development Permit would be required**”, an **historically obtainable goal**. Given the desirability of a cooler climate for many wine grape varieties in the current setting of Climate Change, it is easy to picture vineyards and wineries permitted in the Coastal Zone in future. The vast majority of vineyards in Sonoma County use synthetic pesticides, remove trees, rip land in an erodible manner and require access roads and heavy equipment. These practices would be ecologically disastrous in the Coastal Zone and strongly opposed by the public.

**Recommendation:** Prohibit vineyards and wineries in the Coastal Zone.

**4.3.2 Agricultural Visitor-Serving Uses (Agricultural Tourism)**

“Examples-of these uses are **farm-stays.....**”.

**Comment:** There is countywide difficulty passing a vacation rental ordinance and no vacation rental regulation whatsoever in the Coastal Zone.

**Recommendation:** Please define “**farm-stay**” and “**hosted rentals on agricultural land with regard to their physical setting, purpose, host requirements and activities related to the experience of farm life for visitors.**”

**Page AR-9, Goals, Objectives and Policies|Agricultural Support Uses**

**Policy C-AR-5b:** “Storage facilities shall be permitted for agricultural products grown, prepared, or processed on-site.

**Comment:** It is not unusual for agricultural products grown out of area to be combined with local products, for commercial purposes.

**Recommendation:** **Change to “Storage facilities, processing and promotional activities shall be permitted....”.**

**Table C-AR-3 (NEW) :** **Row crops (cannabis) are Principally Permitted “by right”, with no permit required. Vineyards are Principally Permitted at the discretion of Permit Sonoma. Constraint “2” does not provide appeal details. The “map on file at Permit Sonoma” per which appealable areas are shown is not displayed here, nor described.**

**Comment:** As the LCP will determine Coastal Zone Policy for the next 20 years, it would behoove us to consider the potential water-depleting and other consequences of cannabis farming and processing, vineyards, wineries and events for both these forms of agriculture in the Coastal Zone. There are no criteria listed for discretionary permitting of wineries by Permit Sonoma. There is no mention, let alone regulatory language, re: events on agricultural lands.

**Recommendation:** **Prior to presentation of this Draft LCP Update to the Board of Supervisors, specific policy re: cannabis growing and processing in the Coastal Zone should be written and offered for public review. Likewise, Permit Sonoma criteria for discretionary permitting of vineyards and wineries and event policy for agricultural lands should be written and publicly reviewed.**

**Page AR-11, Goals, Objectives and Policies|Farmworker Housing**

**Recommendation:** **Please add a policy prohibiting conversion of farmworker housing to visitor-serving uses.**

## **Marine Aquaculture Fishing**

**Comment:** Current language regarding aquaculture should be removed and replaced with Coastal Act and OPC consistent policy on aquaculture including policies regulating onshore support facilities with specific requirements of ocean water intake/discharge pipes for onshore aquaculture and—as the County controls leases to Sonoma Coast tidelands—also include policies that protect seagrass and salt marsh habitat, promote practices that reduce marine debris, restrict cultivation of non-native species, protect wildlife habitat, and address spatial conflicts with recreational and commercial fishing uses.

[Cea Higgins is drafting and will submit suggested policy language separately as requested by Gary H.](#)



from *Save the Sonoma Coast*, 3/2/22

## Introduction

### Page INT-2, 1 PURPOSE

The purpose of this Local Coastal Plan Update is to help guide land use planning and development decisions within Sonoma County's Coastal Zone in a manner reflective of current community priorities, responsive to present-day conditions, and consistent with the latest California Coastal Commission policy and guidance. **This update also reflects policies related to coastal development that were adopted by the Sonoma County Board of Supervisors in General Plan 2020, while generally retaining existing land use designations previously certified by the California Coastal Commission. In addition, this Local Coastal Plan Update adds new information and policy in the following areas: sea level rise (2100 planning horizon), biotic resources, geologic hazards, water quality, and public access.** The document has been re-organized to be more consistent with the General Plan 2020 format and includes previously certified Appendices, including the Housing Element, Right-to-Farm Ordinance, Historic Resources Inventory, and development guidelines specific to The Sea Ranch. **This updated Local Coastal Plan considers growth on the Sonoma County Coast as projected, given historic population growth trends and anticipated increases in visitor-serving uses.** Furthermore, build-out is projected based on the continuation of existing zoning land use, density, and minimum parcel size for the period 2015 to 2035.

**Comment:** **".... policies related to coastal development....adopted....in General Plan 2020"** inappropriately assumes development and imposes General Plan policy in the Coastal Zone. The LCP is Not Interchangeable with the Countywide General Plan: In the context of the LCP Update, General Plan 2020 is not arbitrarily transposable to the Sonoma Coast. Transmigration of some of the more concerning aspects of the Countywide General Plan into the LCP should not take place now, nor should it be enabled in the undefined future. Our coast is a unique and irreplaceable asset and deserves the kind of profound respect and due care that it was accorded during the thorough public process by which the first Sonoma County LCP was initially formulated and adopted."

**Recommendation:** Please strike the sentence beginning “**This Update... the one following: “In addition....”**”.

**In their place, we request the following wording:**

“**This Update maintains the intent of its original authors to conserve this priceless and fragile natural resource which provides a powerful buffer against climate change. New science is included in the Elements and Policies with regard to sea level rise (2100 planning horizon), carbon sequestration, conservation of biotic resources, clean energy generation, water quality and re-charge, aquaculture, public access and geologic hazards. The issues of open space, viewscape, small coastal community preservation, public safety, appropriate housing, short-term rentals and a sustainable form of tourism are addressed. In addition, a strike-through comparison of this draft is provided.**” (Please provide a link here.)

“**This updated Local Coastal Plan considers growth on the Sonoma County as projected, given historic population growth trends and anticipated increases in visitor-serving uses.**”

**Comment:** Projections of growth and development in the coastal zone as presumed by previous rates of growth is no longer environmentally viable. The California Coastal Act was written 44 years ago, before climate change was generally recognized and before Bay Area population and wealth burgeoned, creating unimaginable resource and tourism pressures on the Sonoma Coast. In general, the concept of carrying capacity should apply to any new policy applied to the coastal zone, where water, open space, viewsapes, affordable housing, emergency response, roads and other infrastructure are in short supply compared to demand. The 2021 Draft LCP does not reflect the reality of our times nor the necessary restraints required to conserve our coastline over the next 20 years.

**Recommendation:** Please omit the sentence in red above.

**Page INT-2** (typo-should be INT-11), 5 PUBLIC PARTICIPATION

• **Save *Our* Sonoma Coast** should be **Save *the* Sonoma Coast**.

## **SSC LCP Land Use Recommendations:**

**(Please note out-of-sequence policies in this Element)**

### **Important missing components strongly recommended for inclusion:**

**-The list of Permit Sonoma's criteria for development applications requiring a Coastal Development Permit (vs a Ministerial Permit);**

**-Standard 4-week advance public and MAC notice for CDPs, by listserve and public notices;**

**-Minimum 4-week advance public and MAC notice for Ministerial Permits, by listserve**

**-Required public hearings for any new housing or major remodel on the coast (as used to be the norm);**

**-Mention of Environmentally Sensitive Habitat Areas, explicitly listed as a form of deliberate "non-human use" with reference to OSRC Element corresponding section.**

**-A ban on the use of synthetic pesticides and rodenticides in the Coastal Zone (as successfully established in the Santa Monica LCP and Malibu)**

**-Page LU-4: A definition of Principally Permitted Uses is needed, as described in the Coastal Zoning Code, both in Land Use and in the Glossary;**

**-Page LU-9, Timber: of forest values beyond timber harvest. We recommend the insertion in the right-hand margin: "In addition to provision of timber, forests are critical for essential ecological functions, such as carbon sequestration, clean air, water conservation, soil health, erosion prevention and habitat for plants, animals and fungi. Forests and woodlands also provide other human-centric benefits such as scenic views and recreation potential.**

**These specific forest values are important to the quality of the environment and life in the County and are likewise addressed in the Water Resources Element and other sections of this Open Space and Resource Conservation Element."**

**-Vacation Rental Policy: There is none.****A**

**From Richard Charter:** “The vacation rental industry should not continue to displace permanent residents from local communities nor undermine public safety. The contribution that increasing VRBO demand is playing in compounding the scarcity of available housing for local service staff and fishery workers who cannot now find an affordable place to live near the coast also makes it only prudent that the kind of reasonable oversight principles already applied to vacation rentals elsewhere in Sonoma County need to also be governing coastal properties as well.

The Update of the LCP needs to acknowledge the fact that our coast now has a substantial transient population with varied behavioral and ethical standards. The ready availability of computerized advertising and reservation systems has generated a rapid spread of the VRBO industry so that in places it now displaces formerly peaceful family-oriented coastal residential communities, and the result is not always beneficial. There are obvious social and economic costs accruing to our neighborhoods from the VRBO sector that have proven to adversely affect public safety and which sometimes threaten our communities’ valued traditional quality of life. Coastal vacation rentals may seem at first to provide an inevitable and profitable method of providing lodging to the growing number of visitors to our coastal attractions, but various outlaw activities uncharacteristic of our coastal community have occurred in association with vacation rental uses in Taylor Tract in Old Town Bodega Bay.

(<https://www.pressdemocrat.com/news/4281941-181/woman-wounded-man-dead-in>), and in the nearby Bodega Harbor Subdivision, (<https://www.pressdemocrat.com/news/9770962-181/sonoma-county-deputy-shoots-assault>).

Rental visitors exhibited, in these situations, an instance of domestic violence followed by a suicide, and subsequently, a case involving attempted manslaughter via vehicular assault that resulted in eight injuries of innocent bystanders and ended in a police-involved shooting. These tragic occurrences, while high-profile exceptions to the idealized norm promoted by the vacation rental industry, provide compelling evidence that guests utilizing VRBO properties are not being adequately screened and that the composite of short-term-rental properties are not currently being responsibly overseen by diligent nearby accessible management. Sadly, in spite of the high stakes in terms of

public safety, the County is not yet following through to ensure that the kind of responsible management necessary for these kinds of emergent land uses is consistently maintained. A quiet residential neighborhood should not be converted into a virtual industrial park of quasi-motels, even if the influx of new industry is aimed at serving visitors. The contribution that increasing VRBO demand is playing in compounding the scarcity of available housing for local service staff and fishery workers who cannot now find an affordable place to live near the coast also makes it only prudent that the kind of reasonable oversight principles already applied to vacation rentals elsewhere in Sonoma County need to also be governing coastal properties as well., The Sonoma Coast generates substantial revenue to the County from TOT taxes and other sources, but legitimate coastal needs do not yet receive their fair local share of collected revenues in return to support important first-responder services whose time is increasingly spent dealing with visitor-related emergencies. It is now abundantly clear that the Sonoma Coast LCP needs to adapt to this influx of VRBO properties, and the LCP Update now in preparation therefore must exert some reasonable controls over this industry, as has become necessary and is proving effective in other Sonoma County Supervisorial Districts, particularly in neighborhoods near the town of Sonoma where it became obvious that the community had simply reached a “critical mass” of VRBO’s.”

**Our recommendations:**

- a) **Limit the total number of vacation rentals at the Coast.**
- b) **Provide a community with the option of becoming an exclusion zone free of vacation rentals.**
- c) **Maximum occupancy rates not to exceed two persons per bedroom, plus an additional two persons.**
- d) **24-hour management must be available.**
- e) **Each vacation rental location must demonstrate that it has adequate onsite parking on its own parcel, reliable garbage service, and noise must be controlled during quiet hours.**
- f) **The “three-strikes” principle utilized elsewhere in Sonoma County must be applied at the coast, i.e.; three verified violations at one property should lead to a one-year hiatus in vacation rental uses at that site.**

**Text Recommendations:****Page LU-4, Land Use Designations, Open Space (OS), Corresponding Zoning Districts: **Planned Community (PC)****

**Comment:** Further development of Planned Communities in the Coastal Zone with the usual tennis courts and golf courses are untenable for multiple reasons (eg, inadequate water supply, impacts on wildlife, viewscape, erosion, etc) and should be prohibited from the coastal zone entirely. We agree with the Coastal Commission's concern that there is intrinsic adverse impact on Open Space resources by Planned Community development.

**Recommendation: **Drop Planned Community Zoning from Open Space.****

**Page LU-4-5, 1.3 COASTAL LAND USE CATEGORIES, *Other Permitted Uses*: "Land uses permitted or conditionally permitted in the Coastal Zoning Code not described as Principally Permitted Uses are secondary and subordinate to the principal permitted uses and must be compatible with principally permitted land use. It should be noted that the term "permitted uses" as used in the descriptions of the land use categories identify permissible uses consistent with the purpose of the land use category, subject to zoning and permitting requirements of the County. All development within the Coastal Zone requires a discretionary Coastal Development Permit, unless exempt or otherwise categorically excluded by order of the Coastal Commission. Any development that is not designated as the Principally Permitted Use in a particular zone may be appealed to the Coastal Commission.**

**Comment:**

There is potential for mis-use of the category of Other Permitted Uses by undefined discretionary approval of applications, be they outright or gradual, cumulative, piecemeal approval of Uses. For enforcement purposes, the word "discretionary" is too vague.

**Recommendation: **Please provide the link or full text of the Coastal Zoning Code for Other Permitted Uses. Please drop the word "discretionary".****

**Page LU-6, Land Extensive Agriculture and Diverse Agriculture, Principally Permitted Use: “Agriculture (may include grazing, farm animal husbandry, outdoor row crop production with essential support uses including incidental preparation, and limited farm-related residential development).”**

**Comment:** Vineyards and cannabis grows are incompatible with coastal carrying capacity, eg: the Coast’s Class 4 water status, further Climate Change-induced drought, pesticide usage, intrinsically soil-eroding growing practices, the visual blight of hoop houses, increased traffic on Hwy 1 and the need for more emergency and law enforcement services at general taxpayer expense.

**Recommendation: Explicitly exclude cannabis-grows and vineyards and their attendant promotional activities as Ag PPU’s in the coastal zone.**

#### **Page LU-8: Resources and Rural Development:**

**“To protect lands needed for use and production of natural resources (e.g., water, timber, geothermal steam, or aggregate production, water resources, scenic resources, and biotic resources, and to protect lands constrained by geologic, flood, or fire or other hazards, from intensive development.**

##### **Designation Criteria**

**2. Land contains natural resources such as water, timber, geothermal steam, aggregate, or soil.”**

**Comment: Mining in the Coastal Zone, especially in the Cheney Gulch Mineral Resources (MR) interest area should not be allowed, given the known propensity of the area for both gully and sheet erosion and geologic instability. The associated transportation mechanisms for any produced rock, and the high visibility of any resultant mining scars from Highway One; a large cross-country automated conveyor apparatus proposed for Cheney Gulch in recent mining plans and leading to a crushed rock loading facility for transit by barges out of Bodega Bay, also poses the threat of harmful maritime slurry spills and vessel collisions in our harbor.**

“To protect lands needed for use and production of natural resources (e.g., water, timber, geothermal steam, **or aggregate production**, water resources, scenic resources, and biotic resources, and to protect lands constrained by geologic, flood, or fire or other hazards, from intensive development.

### **Designation Criteria**

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When Bill Dutra attempted to expand quarry operations at Cheney Gulch in 2007, the only aggregate mining site in the Coastal Zone, he received the letter of denial below from then-Executive Director of the California Coastal Commission, Peter Douglas. Peter’s comments are more relevant now than they were in 2007, before Climate Change was fully recognized and protections were being implemented. We agree with him that aggregate mining is inappropriate in the Coastal Zone.



We are also deeply concerned about the appearance of further language in the Open Space and Research Conservation Element:

**Page C-OSRC 41, 42, Mineral Resources, Policy C-OSRC-10a: “Consider areas designated by the State Mining and Geology Board as regionally significant for construction grade aggregate as priority sites for aggregate production and mineral extraction. Within the Coastal Zone, these areas are currently limited to sandstone deposits located in Cheney Gulch, approximately 2.5 miles east of Bodega Bay in western Sonoma County.2 Review requests for designation of additional areas for consistency with the Coastal Act, Local Coastal Plan, and the.....” Aggregate Resources Management (ARM) Plan. (GP2020 REVISED)”**

Additionally, the project must demonstrate that and economic need exists for aggregate materials produced at the site and that **full reclamation of the site is feasible and that reclamation will fully restore ecological function of the site to that which existed prior to any mining operation. (GP2020 REVISED)”**.

**Full reclamation as described is not physically possible. Disruptions of habitat, soils, plants, etc, are not remediable, based on current science (eg, see Fremontia, Vol 1, #48, ETHICS OF PLANT REINTRODUCTION IN THE 21ST CENTURY, by Naomi Fraga).**

**Recommendation: Drop aggregate and aggregate production from the list of protected land uses in both Land Use and the Open Space and Resource Conservation Elements.**

**Page LU-23: Policy C-LU-6o:** “Encourage a modest infill of visitor and local-serving commercial development in Jenner if water supply and wastewater Douglas’ comments are more relevant now than they were in 2007, before Climate Change was fully recognized and protections were being implemented. We agree with him that aggregate mining is inappropriate in the Coastal Zone.

**Comment:** Served by a mutual water system, Jenner currently has a moratorium on any further development of visitor-serving commercial facilities due to existing infrastructural inadequacies and also public safety hazards.

**Recommendation:** [Delete this policy.](#)

**Policy C-LU-6q:** Encourage expansion of public access the Bridgehaven Resort, by adding boat rentals and launching and day use facilities subject to design review. Require public access as a condition of for approval of any Coastal Permit for expansion of uses at the resort.

**Comment:** Bridgehaven is not a “resort”, but a small number of older, fragile, single-family dwellings built close to the flood level of the Russian River along Willow Creek Road, which accesses the Willow Creek portion of Sonoma Coast State Park. It is located just downstream from the confluence of Willow Creek, the last monitored anadromous fish-bearing tributary to the Russian River before it empties into the Pacific Ocean. Recreational development of this sensitive and fragile habitat is contradictory to basic principles of coastal habitat conservation.

**Recommendation:** [Delete this Policy.](#)

**Page LU-25, Policy C-LU-2g:** “Notwithstanding the provisions of the Public Facilities and Services Element, **connection of sewer service to the Bodega Bay Public Utilities District shall be allowed for uses that directly relate to and support the fishing industry** in Bodega Bay and that cannot be located within the Urban Service Area. An out-of-service area agreement shall be used in such cases. (GP2020

**Comment:** This policy probably violates State law, LAFCO policy, Public Health and other County policies. It does not specify that the parcel has to be contiguous to the BPUD. What uses that directly “relate to and support fishing”

can't be in the USB? A restaurant selling local fish? Boat yard? Net making? If there is a parcel that may in the future meet this criteria, name the parcel(s) by #AP and note in the LCP that applicants may apply in the future for a GP amendment, an LCP amendment and annexation to the BPUD. Otherwise, this is an invitation for endless speculation.

**Recommendation:** [Delete this policy.](#)

**Page LU-26, Policy C-LU-2m: “Water and sewer service extensions to public parklands outside of Urban Service Areas may be allowed only where consistent with the Public Facilities and Services and Public Access Elements. An out-of-service area agreement shall be used in such cases.”**

**Comment:** Water and sewage extensions to parklands outside urban boundaries, as with Policies C-PF-2 b and e, is antithetical to the intent of the Coastal Act to protect natural resources. It invites extra-urban development. It is impractical and was taken from the GP, referring to cities with extensive sewage and infrastructure.

**Recommendation:** [Delete this policy.](#)

## SSC Open Space and Resource Conservation Recommendations

To put this Element in perspective, visit this link to see Sonoma County's critical position in preserving global biodiversity: <https://www.nytimes.com/interactive/2022/03/03/climate/biodiversity-map.html>

### Page C-OSRC 3, 1.1 PURPOSE, 1st paragraph:

“State law recognizes that open space land is a limited and valuable resource which must be conserved **wherever possible**. The Open Space and Resource Conservation (OSRC) Element of the Local Coastal Plan must address open space for the preservation of natural resources; **for the managed production of resources**; for outdoor recreation; for public health and safety; and for the preservation of archaeological, historical, and cultural resources.

**Comment:** The opening paragraph of OSRC is out of touch with the rapidly unfolding reality of our new climate and natural world.

**Recommendation:** Drop the words “wherever possible” in the first sentence and the words “managed production of resources”. Change to: “.....open space for the conservation and restoration of natural resources.....cultural resources”. Add: “Modern Science shall provide guidelines and best practices for carbon sequestration and climate change mitigations throughout this Element.”

**2nd paragraph:** "The purpose of the Open Space and Resource Conservation Element is to preserve the natural and scenic resources which contribute to the general welfare and quality of life for the residents of the Sonoma County coast and to the maintenance of its tourism industry. This Element provides the guidelines for making necessary consistency findings and includes an implementation program, as required by law."

**Comment:** Currently, while lucrative for business owners, tourism in the Coastal Zone is unregulated and has adverse effects on the quality of life for both animal and human residents.

**Recommendation: Change first sentence to: "...Sonoma County Coast and to maintain a science-based balance of tourism activities with current and future ecosystem, residential and natural resource limitations."**

**Add 3rd paragraph (or new policy) as enforcement: "When human activities lead to or are possible consequences of actions that may damage or harm human or other living organisms' health through the neglect, damage, destruction or elimination of individuals, populations or their habitats and physiological, behavioral, or ecological requirements, such actions shall be suspended until ample scientific evidence and ethical consideration can be applied to determine the least harmful course of action. Consideration of must be extended to future generations of all species that might be affected, regardless of any apparent physical disjunction."**

**Page OSRC-5, Vista Points: "Designated Vista Points shall be developed with safe ingress and egress, parking areas, interpretive signs, and restrooms where these facilities do not have an adverse impact on Environmentally Sensitive Habitat Areas, or on any other coastal resource."**

**Comment:** There are many reasons why development of vista points as described above are a bad idea for the Coastal Zone:

- 1) Vista points (parking lots) would themselves have a negative impact on "other coastal resources": scenic landscapes;
- 2) Hwy 1 is over-capacity already, with miles-long traffic back-ups on weekends and holidays. Vista Points and turn-outs would contribute to more vehicle traffic, further aggravating the situation;
- 3) Emergency personnel are already unable to respond to various accidents in a timely fashion due to traffic on Hwy 1;
- 4) "Parking areas, interpretive signs and restrooms would require grading of fragile, narrow bluff-tops and servicing of septic waste and garbage;
- 5) "Safe ingress and egress" would require road widening in a zone of highly erodible soils and steep bluffs.
- 6) Climate Change dictates a necessary reduction in vehicle miles and will put construction in areas of geologic instability at accelerated risk of erosion and bluff failure.

**Recommendation: Drop the section on vista points and references to them from the Element.**

**Page OSRC-6, Scenic Corridors:** “The primary impression of any area on the Coast comes from what is seen while driving, cycling, or hiking along a roadway. One of the most effective methods of protecting visual resources is to protect scenic corridors along a system of scenic roads.”

**Comment:** It is ironic that Hwy 1 is eligible for designation as a Scenic Highway, but our county has never applied for what would be an easy and certain approval. Per CalTrans, a required Corridor Protection Program for a Scenic Highway includes “visual quality protection measures that exist at the local level in five legislatively required areas:

1. Detailed land and site planning;
2. Regulation of land use and density of development;
3. Control of outdoor advertising;
4. Careful attention to and control of earthmoving and landscaping; and
5. The design and appearance of structures and equipment.

Public participation in developing any new elements is very important if the program is to have popular support.”

**Recommendation:** [Apply for official Scenic Highway designation for Highway 1.](#)

## **Criteria for Establishing Buffer Areas**

### **ATTACHMENT "M"**

5. Use of existing cultural features to locate buffer zones. Cultural features, (e.g., roads and dikes) should be used, where feasible, to buffer habitat areas. **Where feasible, development should be located on the side of roads, dikes, irrigation canals, flood control channels, etc., away from the environmentally sensitive habitat area.**

**Comment:** This criterion allows for development in ESHA buffers.

**Recommendation:** Any application specifying development in an ESHA buffer must be public and MAC-noticed and reviewed by the California Coastal Commission.

**Page OSRC-14, Biotic Resources of the Coastal Zone:**

The four “main” biotic resource categories are not sufficiently detailed to develop policies within those types (eg, grouping forests and the myriad grassland and scrub vegetation types into a single terrestrial habitat group). These systems influence, are contiguous and mutually dependent on each other, as well as those further inland and further seaward. Lack of this understanding leads to the promotion of some habitats and species as more worthy of conservation, when all ecosystems play an integral role in regional and global ecological health and functioning.

**Recommendation:** Change the first paragraph wording to: “The four main biotic resources categories represented in this section are streams and riparian corridors, wetlands, marine resources, and terrestrial habitats. Within the four main categories are many more subcategories, all of which are inter-dependent and necessary to the healthy functioning of the Coastal Zone as a whole. Included here are goals, objectives, and policies for the protection and management of such resources.....”

### 3.2 BIOTIC RESOURCE PROTECTIONS

**GOAL C-OSRC-5:** “Protect and enhance the native habitats and diverse ecological communities on the Sonoma County Coast.”

**Recommendation: Add:** “....through inventories, assessment, conservation measures, monitoring, and analysis.”

**Objective C-OSRC-5.1:** “Identify and protect native vegetation and wildlife, particularly occurrences of special status species, wetlands, sensitive native communities, and areas of essential habitat connectivity.”

**Comment:** This is an incomplete and non-specific Objective.

**Recommendation: Change to** “....protect all native vegetation and wildlife. Specifically map occurrences of special status species, wetlands, sensitive

native communities, and areas of essential habitat connectivity, including minimum 200' buffers to include areas for potential species' future movement and expansion. "

**Objective C-OSRC-5.6:** “Balance the need for agricultural production, development, timber and mining operations, and other land uses with the preservation of biotic resources.”

**Comment:** Biotic Resources are dwindling at a rapid rate and cannot be replaced.

**Recommendation: Change to:** “Protection of Biotic Resources will take precedence over expansion of agricultural production, development, timber and mining operations, and other land uses.

**Page OSRC-15-16, Streams and Riparian Corridors:** See the 3 paragraphs describing streams and riparian corridors. There is **no mention of upslope impacts on stream hydrology, water quality, and habitat connectivity, from timber extraction, agriculture and livestock ranching.**

**Comment:** Even now, permits for timberland conversion to vineyards are being approved, with resultant siltation and pesticide run-off into tributaries of the Gualala River.

**Recommendation: Insert as next-to last line in first para on page 16, after “...fish and wildlife.”:** “Upslope impacts on stream hydrology, water quality, and habitat connectivity, including those related to timber extraction, agriculture and livestock ranching, will be reflected in Policies.”

**Page OSRC-17, Wetlands, 1st paragraph:** “Salt and brackish marshes have been greatly reduced from their historical extent and are important habitat to protect and restore, where feasible.”

**Comment:** Coastal wetlands have been reduced by 67% (<https://defenders.org/blog/2017/08/californias-disappearing-wetlands-face-new-perils>).



**Recommendation: Change to:** “Salt and brackish marshes and all wetlands have been reduced 67% from their historical extent and will be reduced further with climate change. They are critical habitat to restore and protect. Drop "where feasible”.

**Page OSRC-17, Marine Habitats, 2nd paragraph:** “Bodega Harbor and Estero Americano also contain exposed tidal mudflats at low tide which provide an important invertebrate food source for shorebirds.”

**Recommendation: Please add:** "These mudflats also contribute to Bodega Bay's designation in 2001 as an Important Bird Area (IBA) by the American Bird Conservancy, one of 500 Globally Important Bird Areas."

**Page OSRC-17-18, 5th Paragraph:** “Stellar sea lions and other pinnipeds haul out on offshore intertidal areas that become exposed at low tides. Seals and sea lions use intertidal areas and sandy beaches, spits, and bars to haul out and rest. Harbor seals specifically use sandy beaches including the beaches at Sonoma Coast Sea Ranch, Jenner and Bodega Bay to rest, molt, give birth, and nurse their pups. California sea lions and northern elephant seals are occasionally observed at these harbor seal haul out locations.”

**Comment:** There is insufficient description of the importance of protection of haul-out areas, which even today are subject to human and dog intrusions, with inadequate State Parks staffing to monitor the sites.

**Recommendation: Change to:** "Stellar sea lions, protected under both the Endangered Species Act (ESA) and the Marine Mammal Protection Act (MMPA), along with California sea lions and other pinnipeds, also protected by the MMPA, haul out on offshore intertidal areas that become exposed at low tides as well as on offshore rocks.....Harbor seals, in addition to using offshore rocks along the Sonoma coast, specifically use sandy beaches at Sonoma coast locations at Sea Ranch, Sonoma Coast State Park, Goat Rock Beach in Jenner and in the intertidal areas of Bodega Bay to rest, molt, give birth, and nurse their pups.”

**Page OSRC-18, Terrestrial Habitats, 3rd paragraph:** “Following conversion from native bunch-grass and herb dominated communities to vegetation dominated by non-native grasses and herbs, much of Sonoma County’s

**historic coastal grasslands are now considered non-native annual grasslands after undergoing substantial conversion.”**

**Comment:** Per expert botanist Peter Warner, there are still rare native plant populations observable in our coastal grasslands.

**Recommendation: Please change to:** "...**Sonoma County's historic coastal grasslands are now considered reservoirs of habitat remnants as well as microsites supporting extant populations of rare plants.**"

**Page 18, continued, last sentence:** “Coastal prairie and scrub habitat occurs mostly on protected lands including Wright Hill Ranch, Salt Point State Park, Jenner Headlands Preserve, and Sonoma Coast State Park.”

**Comment:** This sentence is inaccurate, per Peter Warner.

**Recommendation: Change to:** “**Coastal prairie (historically or currently as coastal non-native annual or perennial grassland) and scrub habitats are extensive on private as well as on public lands within the coastal zone from Estero Americano north to Russian Gulch.**”

**Page OSRC-19, 3.3 ENVIRONMENTALLY SENSITIVE HABITAT, Policy C-OSRC-5b(1), (2):** Areas that contribute to the viability of plant or animal species designated as rare, threatened, or endangered under State or Federal law.

**Recommendation: Add:** “**...law, including potential wildlife corridors, watercourses, nesting, prey habitat and mating areas.**”

**Policy C-OSRC-5b(2)(10)-re:ESHA designation—**“Habitats that Support Listed Species”

**Recommendation: Change to:** “**Habitats, wildlife corridors and areas that contribute to the viability of Listed Species or those of impending rarity.**”

**(11)** “Tree stands that support raptor nesting or monarch populations”

**Recommendation: Change to: "Tree stands that support raptor and prey perching or nesting and their food sources, and/or monarch populations."**

**Page OSRC-20, Policy C-OSRC 5b (8): If proposed development is a permissible use and there is no feasible alternative, including the no project alternative, that can avoid significant impacts to ESHA, then the alternative that would result in the fewest or least significant impacts shall be selected. Residual adverse impacts to ESHA shall be fully mitigated, with priority given to on-site habitat mitigation. Off-site habitat mitigation measures shall only be approved when it is not feasible to fully mitigate impacts on-site or where off-site habitat mitigation is more protective, as documented in a biological resource assessment prepared by a qualified biologist and approved by Permit Sonoma staff.** Any determination that it is infeasible to mitigate impacts onsite should be supported by written findings. Mitigation may not be used as a substitute for implementation of the feasible project alternative that would avoid impacts to ESHA. Mitigation for impacts to ESHAs other than marine habitats shall be provided at a minimum ratio of 2:1. The more specific mitigation requirements as required by regulatory agencies or the County shall control over the more general mitigation requirements of this Local Coastal Plan. (NEW)

**Comment:** After all the protective language re: ESHA, this policy comes as a shock, approving development in ESHA with theoretical mitigation as the rationale. There is no adequate mitigation for destruction of ESHA, particularly off-site attempts to construct equivalent ESHA de-novo.

**Recommendation: Strike this policy as it stands. Change to: "If proposed development is a permissible use and there is no feasible alternative, including the no project alternative, that can avoid significant impacts to ESHA, then the application shall be referred to the Coastal Commission, with noticed to the MAC and the public at large. The applicant shall be informed that no further action is possible until the Coastal Commission has made a determination of the viability of the application."**

**Policy C-OSRC-5b(10):** "If the application of the policies and standards contained in this Local Coastal Plan regarding use of property designated as ESHA or ESHA buffer, including the restriction of ESHA to only resource-dependent use, would likely constitute a taking of private property without just

compensation, **then a use that is not consistent with the ESHA provisions of the Local Coastal Plan may be allowed on the property, provided such use is consistent with all other applicable policies of the Local Coastal Plan**, the approved project is the alternative that would result in the fewest or least significant impacts, and it is the minimum amount of development necessary to avoid a taking of private property without just compensation. In such a case, mitigation for impacts on ESHA shall be required in accordance with applicable Local Coastal Plan policies. Mitigation may not be used as a substitute for implementation of a feasible project alternative that would avoid adverse impacts to ESHAs. (NEW)”

**Comment:** As immediately above, this policy flies in the face of previously stated ESHA protections.

**Recommendation:** **Strike this policy as it stands. Change to: “If the application of the policies and standards contained in this Local Coastal Plan regarding use of property designated as ESHA or ESHA buffer, including the restriction of ESHA to only resource-dependent use, would likely constitute a taking of private property without just compensation, then the application shall be referred to the Coastal Commission, with noticed to the MAC and the public at large. The applicant shall be informed that no further action is possible until the Coastal Commission has made a determination of the viability of the application.”**

**Page OSRC-22, Policy C-OSRC-5c(3):** “Channelizations, dams, or other substantial alterations of rivers and streams shall be prohibited except for: (1) necessary water supply projects, (2) flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development, or (3) developments where the primary function is the improvement of fish and wildlife habitat. Any channelization or stream alteration permitted for one of these three purposes shall minimize impacts to coastal resources, including the depletion of groundwater, and shall include measures sufficient to appropriately mitigate unavoidable impacts. **Alternatives that incorporate a biotechnical component to river or stream bank stabilization (e.g., pocket planting and joint planting, vegetated crib walls, vegetated slope gratings, etc.) shall be encouraged over alternatives that employ strictly hard solutions (e.g., concrete wall or riprap banks)** so long as the alternatives are consistent with all other applicable provisions of this LCP...”

**Comment:** "NMFS recently completed a programmatic biological opinion in consultation with the U.S. Corps of Engineers (SF District) that encourages the use of bio-engineered bank stabilization when protecting critical infrastructure threatened by streambank erosion. Designing and implementing bio-engineered projects in accordance with the programmatic biological opinion will significantly streamline federal project permitting."

**Recommendation:** Strike the word "encouraged" and replace it with "required." End with the sentence, "Design and implement bio-engineered projects in accordance with the programmatic biological opinion to significantly streamline federal project permitting."

**Policy C-OSRC-5c(6):** "In Anadromous Fish Streams (Chinook and Coho Salmon Habitat),...."

**Comment:** This policy refers to "Anadromous Fish Streams", but qualifies that terms as "Chinook and Coho Salmon Habitat". Steelhead are a federally-listed anadromous species, and as such should be included in the above qualifier.

**Recommendation:** Change to "In Anadromous Fish Streams (Chinook and Coho Salmon and Steelhead) Habitat,...."

**Page OSRC-23, Policy C-OSRC-5c(8):** "As part of the environmental review process, refer permit applications near streams to California Department of Fish and Wildlife and other agencies responsible for natural resource protection. (GP 2020)"

**Comment:** "Per NOAA's advisory letter to Permit Sonoma on 2/8/2017: "We request that NMFS be included as an agency "responsible for natural resource protection", and thus be afforded the opportunity, like the California Department of Fish and Wildlife, to review and provide comment on permit applications near streams or waterways."

**Recommendation: Change to:** “As part of the environmental review process, refer permit applications near streams to California Department of Fish and Wildlife and other agencies responsible for natural resource protection, *including NMFS. (GP 2020)*”

**3.5 WETLANDS, Policy C-OSRC-5d(1):** “Wetlands are here defined to include marshes, ponds, seeps, and reservoirs.”

**Recommendation: Add:** “..marshes, ponds, seeps, reservoirs, pond edges, seasonally inundated grasslands and scrub wetlands), as well as the contiguous upslope portions of riparian habitats.”

**Policy C-OSRC-5d(5):** “Diking, filling, draining, and dredging of coastal waters, wetlands, and estuaries shall be permitted only in accordance with other applicable provisions of this Local Coastal Program and only when consistent with Coastal Act, Section 30233., where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to uses and methods described in Habitat Protection Guidelines, Appendix E-5.”

**Comment:** does not specify best practices for dredging, etc, available in the Marine Sanctuary guidelines.

**Recommendation: After “Appendix E-5”, insert:** “Best practices for dredging, etc, shall be guided by Marine Sanctuary guidelines.”

**Page OSRC-24, Policy C-OSRC-5d(6), (7),** “In wetlands, the following uses and activities shall be prohibited: **(6)** Construction of agricultural, commercial, industrial, and residential structures: “Between 100 to 300 feet, unless an environmental assessment or qualified biologist shows the proposed activity/development would not have an adverse impact on the wetland.”

**Comment:** This policy allows for new construction with mitigations within 100’ of wetlands. These are not science-based policies and do not anticipate future industry such as aqua-farming.

**Recommendation:** Change to “Construction of agricultural, commercial, industrial, residential and future potential structures, such as those associated with aquaculture....Between 100 to 300 feet, unless an independent environmental assessment or qualified biologist shows the proposed activity/development would not have an adverse impact on the wetland.”

**Page OSRC-26, Policy C-OSRC-5e(3)** “Public access to Offshore Rocks and onshore nesting/rookery areas used by seabirds to breed or nest or which provide habitat for seals and sea lions shall be prohibited. (EXISTING LCP REVISED: RECOMMENDATION 39 ON PAGE 31) and **5e(5)**: “Disturbance of marine mammal haul-out grounds shall be prohibited and recreational activities near these areas shall be limited to passive recreation. Disturbance of areas used by harbor seals and sea lions shall be **avoided**. (EXISTING LCP REVISED)

**Comment:** Both of these policies are intended to protect biological resources (nesting birds on offshore rocks and disturbance of marine mammal haul outs). But there is no mechanism specified for enforcement of the prohibitions against trespass on or disturbance of these sensitive habitats. We agree with The Sea Ranch in suggesting a new policy:

**Recommendation:** “Policy C-OSRC 5e (5a): Encourage the joint development of a plan by State and County Parks, USFWS, BLM and Stewards of the Coast and Redwoods for protection of these biological resources (nesting birds on offshore rocks; marine mammal haul-outs) through noticed, enforceable public access limitations.”

**Policy C-OSRC-5e(4)(3):** “Opening of sand bars, except where necessary for maintenance of tidal flow to ensure the continued biological productivity of streams and associated wetlands and to prevent flooding. Applications for allowable opening shall include a plan, prepared in consultation with and reviewed by applicable resource agencies (e.g., National Marine Fisheries Service and California Department of Fish and Wildlife) that describes measures that will be implemented to **avoid and/or minimize impacts on special status species** affected by the proposed action. Sand bars shall not be breached until there is sufficient in-stream flow to preserve anadromous fish runs. (EXISTING LCP REVISED)

**Comment:** As written, this policy language is not strong enough to protect special status species.

**Recommendation: Change to: "...implemented to *prevent impacts on special status species*....".**

**Policy C-OSRC-5e(6):** “Encourage the California Department of Fish and Wildlife to monitor Marine Mammal Haul-Out Grounds on an annual basis to determine their condition and level of use by marine mammals; and to incorporate this information into its management plan for marine mammals. (EXISTING LCP REVISED)”

Comment: “Encourage” is very weak language here and ANNUAL not sufficient. Stewards currently monitors on a bi-weekly basis and monitoring should occur on a weekly basis during March-June pupping season and the August-September molting season.

**Recommendation: Change to: "Collaborate with the California Department of Fish and Wildlife to monitor Marine Mammal Haul-Out Grounds on a bi-weekly basis and on a weekly basis during pupping season (March through June) and molting season (August through September), in order to determine their condition and level of use and to incorporate this information into its management plan for marine mammals."**

**Page OSRC-27, 3.7 TERRESTRIAL HABITATS, Policy C-OSRC-5f(1):**

“On dunes/coastal strand, the following uses and activities shall be prohibited:  
(1) Uses other than resource-dependent, scientific, educational, and passive recreational uses including support facilities.”

**Comment:** The exemption of undefined ""support facilities"" is improper.

**Recommendation: Please define and give examples of “support facilities”.**

**Policy C-OSRC -5(5)** Removal of sand **except where required for construction of parks and support facilities.** (EXISTING LCP REVISED)



**Comment:** It would be ecologically destructive to build parks and support facilities that require sand removal.

**Recommendation:** **Drop this policy.**

**Policy C-OSRC-5f (2):** “On dunes/coastal strand, carry-out the following activities to preserve native vegetation: (1) Limit public access in areas of plant communities. (2) Post signs which explain the importance of limiting public access to protect plant communities.

**Comment:** More detail is needed to account for current public practices and dog incursions into habitat.

**Recommendation: Change to:** **"On dunes/coastal strand and other sensitive areas frequented by people, carry out the following..." (2) Post signs...limiting public access, including dogs, to protect plant and wildlife communities."**

**Page OSRC-28, Policy C-OSRC-5f(6):** “The identification through site assessment, preservation, and protection of native trees and woodlands shall be required. **To the maximum extent practicable, the removal of native trees and fragmentation of woodlands shall be minimized; any trees removed shall be replaced, preferably on the site at a greater than 1:1 ratio (and at a greater than 3:1 ratio for riparian trees); and permanent protection of other existing woodlands shall be provided where replacement planting does not provide adequate mitigation. (GP2020 REVISED)”**

**Comment:** Currently, we are losing native trees and woodlands at an alarming rate to development of various types, particularly viticulture and soon cannabis grows. This policy language is permissive, vague and unrealistic with regard to mitigation.

**Recommendation: Change to:** **“The removal of native trees and fragmentation of woodlands shall be prohibited without a widely noticed public hearing. Any trees removed with public consent shall be replaced....and permanent protection of other existing woodlands shall be provided in addition to replacement planting.”**

**Page OSRC-29, Policy C-OSRC-5f(9):** “Encourage preservation of remaining old growth Redwood and Douglas Fir forests in private ownership. Because of their rarity and biological importance, these forests should be made priorities for protection through conservation easements, fee title purchase, or other mechanisms. (GP2020 REVISED)”

**Commented [A35], Peter Benham for the CCC:** “Redwoods, Douglas Fir, and other rare or important tree species should be defined as ESHA within the ESHA definition given in this chapter.”

**We agree and would like to see this recommendation appear in the Draft.**

**Policy C-OSRC-5f(10):** At, around, and near osprey nest sites, the following shall be prohibited:

- (1) Removal of osprey nests.
- (2) Removal of snags and dead tops of live trees.
- (3) Development of new structures and roads.

Recreational activities shall be limited to low-intensity passive recreation, these areas are particularly vulnerable during the period of egg incubation in May to July and activities should be further limited.

Osprey nest sites located adjacent to Willow Creek, Freezeout Creek, and Russian River shall be protected from disturbance by timber harvesting activities. (EXISTING LCP REVISED)

**Comment:** This list of protected bird species is incomplete.

**Recommendation: Change to: “..near osprey, eagle and kite nests and any other threatened or endangered birds’ nests, the following .....”**

**Remove the word “Osprey” and simply state: “Nest sites located adjacent.....”.**

**Page OSRC-30, Policy C-OSRC-5f(13):** “On coastal bluffs, public access in areas used by birds for nesting or resting and removal of native plant species shall be **minimized**. (EXISTING LCP REVISED)

**Recommendation: Change “minimized” to “prohibited”.**

#### 4 COMMERCIAL FISHING AND SUPPORT FACILITIES POLICY 4.1 BACKGROUND, Climate Change

**Recommendation:** Please include in this section a link to the EPA's website for a modern summary of effects of Climate Change on Fisheries.

#### Page OSRC-33, Marine Debris, State and Federal Programs:

**Comment:** No mention is made here of a recent collaboration between Sonoma County and the Greater Farallons National Marine Sanctuary, which specifies best practices for dredging operations.

**Recommendation:** Reference and adhere to the Marine Sanctuaries' best dredging practices document. Reference, update policies for consideration of beneficial reuse of dredge materials, and adhere to the Greater Farallones National Marine Sanctuaries Coastal Resilience Plan for Bodega Harbor (<https://nmsfarallones.blob.core.windows.net/farallones-prod/media/docs/20191101-coastal-resilience-and-sediment-plan.pdf>).

**Page OSRC-37, Soil Erosion:** "Hillside cultivation and overgrazing are a particular concern in agricultural areas. Measures are needed to reduce erosion. **However, erosion protection measures may not always be cost effective for the landowner.**"

**Comment:** The second sentence implies that landowners will be exempted from erosion control policy. Per NOAA letter to Permit Sonoma of 2/8/2017 in this regard: "The last sentence appears to be a non-sequitur, and does not contribute to a section that is attempting to promote and encourage soil conservation and management practices."

**Recommendation:** When soil erosion is a potential threat such that appropriate protection measures are not "cost-effective" to a landowner, then the project in question should be denied a permit until such measures can be implemented.

**Objective C-OSRC-8.2:** "Establish ways to prevent soil erosion and restore areas damaged by erosion."

**Comment:** This Objective is out of date and non-specific.

**Recommendation: Change to:** “Prevent soil erosion and restore areas damaged by erosion by bringing property owners’ practices into alignment with the USDA’s recommendations: ([https://www.nrcs.usda.gov/Internet/FSE\\_DOCUMENTS/nrcs144p2\\_063808.pdf](https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs144p2_063808.pdf)).”

**Page OSRC-38, 6 TIMBER RESOURCES POLICY, 6.1 BACKGROUND, Timberland Resources:** Forests and woodlands provide a number of aesthetic and ecological benefits such as wildlife habitat, watershed protection, scenic views, and recreation. These forest values are important to the quality of the environment and life in the County and are addressed in the Water Resources Element and other sections of this Open Space and Resource Conservation Element.

**Recommendation:** Please make this language more specific, scientific and modern: “Forests are critical for essential ecological functions, such as carbon sequestration, clean air, water conservation, soil health, erosion prevention and habitat for plants, animals and fungi. Forests and woodlands also provide other human-centric benefits such as scenic views and recreation potential.”

**Page OSRC-40, Timberland Environmental Impacts**

**Recommendation: Insert Objective C-OSRC-9.3:** “Review new science on optimal forest management for habitat, carbon sequestration and fire prevention. Continuously updated guidelines can be found in Santa Cruz County's forestry management plan and [https://woodlandfishandwildlife.com/wp-content/uploads/2019/12/Wildlife-Friendly-Fuels-Reduction-in-Dry-Forests-of-the-Pacific-Northwest\\_reduced.pdf](https://woodlandfishandwildlife.com/wp-content/uploads/2019/12/Wildlife-Friendly-Fuels-Reduction-in-Dry-Forests-of-the-Pacific-Northwest_reduced.pdf)

**Page OSRC-41, Mineral Resources Policy**

Please see SSC’s comments and recommendations on this subject in the Land Use Element.

**Page OSRC-42, Energy Resources Policy, 8.1 Background:** “Residents, visitors, and businesses to the Sonoma Coast consume energy in many forms and for many uses, but primarily oil and gas for transportation due to the reliance on automobiles, lack of public transit, and long distances to destinations.

**Comment:** In general, this information is not specific to the coastal zone. It also lacks any modern scientific references. The background section does not discuss the unique situation of coastal communities.

**Recommendation: Please add:** “In addition, coastal communities depend on imported sources of energy, including liquid fuels and electricity. They are vulnerable to energy disruptions from natural hazards such as geological events, storm surges and damage to transportation lifelines. This dependency underscores the importance of supporting enhanced independent energy initiatives in coastal areas.”

**Page OSRC-45, Energy Production and Supply, Policies:**

**Comment:** This section does not discuss the current status of renewable and distributed generation applications on the coast. This data are available. There is no mention of the county’s community choice agency, Sonoma Clean Power, and its impact on the shift to renewable vs fossil fuel energy supply sources. Policy recommendations encourage the development of renewables in a generic way, but there is no mention of the potential future importance of microgrids, County solar incentive programs such as PACE, etc.

**Recommendation: Suggest adding the following new policies:**

**"Policy C-OSCR 12d: Encourage the development of microgrids and storage capacity to enhance the energy independence and energy security of coastal communities."**

**“Policy C-OSCR 12e: Encourage and promote County and Sonoma Clean Power programs that provide incentives for the development and use of renewable energy in the residential and commercial sectors.”**

**Page OSRC-46, AIR RESOURCES POLICY, Policy C-OSRC-13c:**

**“Any proposed new source of toxic air contaminants or odors** shall provide adequate buffers to protect sensitive receptors and comply with applicable health standards. Buffering techniques such as landscaping, setbacks, and screening in areas where such land uses abut one another shall be used to promote land use compatibility. (GP2020)

**Comment:** This policy transferred from an as-yet uncompleted General Plan is inappropriate for the environmentally-sensitive Coastal Zone.

**Recommendation: Change to: "No new sources of toxic air contaminants or foul odors shall be permitted."**

### **Implementation Programs:**

**Recommendation:** Please add a **Program** to keep the ecological status of the Coastal Zone monitored to avoid on-going resource-extractive activities monitored and controlled:

**"Initiate ecological monitoring of all recreational or other public uses of undeveloped (open space) areas, to include assessments of human carrying capacity, deleterious impacts associated with human activities (e.g., erosion, soil compaction, loss of or damage to vegetation or wildlife habitat, noise or light pollution) etc.**

**A provision for ecological monitoring and a schedule of assessment and response to ongoing data accrual shall also be required for all extractive agricultural activities, specifically including crop production, wine grape and cannabis production (*in case they manage to sneak in against our strongest recommendations!*), grazing and livestock rearing and development, timber extraction, road construction, prescription fire (as much as this must be incorporated into regional vegetation management policy or any other activity) – past, current, future – with the potential to render impacts to ecosystem constitution or function."**

### **Page OSRC-48, 10.2 OTHER INITIATIVES, Other Initiative C-OSRC-2:**

"Support voluntary programs for habitat restoration and enhancement, hazardous fuel management, removal and control of invasive exotics, native plant revegetation, treatment of woodlands affected by sudden oak death, use of fencerows and hedgerows, and management of biotic habitat. (GP2020)"

**Comment:** This Initiative implies a policy of clear-cutting oaks that appear to be infected with Sudden Oak Death.

**Recommendation: The California Native Plant Society should be consulted on these Initiatives.**

**List of Figures:**

**ESHA Maps, 1-11, C-OSRC-2-ESHA Map Series:**

The original map series for ESHAs only recognized steelhead presence in the Russian River, Salmon Creek, and Estero Americano. Identified dependent steelhead populations from Spence et al. (2008) exist also in Kohlmer Creek, Fort Ross Creek, Russian Gulch, Scotty Creek, and tributaries of the Bodega Harbor. SeaGrant is also monitoring returning anadromous fish returns in Green Valley, Dutch Bill and Willow Creeks. Please make any needed corrections in your map files.

**Maps C-2a - 2k:**

These maps are at least 13 years old, not recording the acquisition of Jenner Headlands by the Sonoma Land Trust in 2009. For that reason and the acknowledged fact that the maps are not “exhaustive”, they cannot be the basis for zoning, policy or enforcement. They *should* be exhaustive, erring on the side of greater ESHA protection, buffers and potential wildlife retreat, given the rapid loss of biodiversity with the current climate emergency.

There is also no recognition or inclusion of coastal prairie, a disappearing habitat, which comprises a much larger proportion of the maps than is shown.

**From:** [Laura Morgan](#)  
**To:** [Jacquelynn Ocana](#); [Kevin Deas](#); [Caitlin Cornwall](#); [Eric Koenigshofer](#); [Larry Reed](#)  
**Cc:** [Gary Helfrich](#); [Peter@Coastal Benham](#); [Tennis Wick](#); [Stephanie@Coastal Rexing](#); [Lynda Hopkins](#); [Ernie Carpenter](#); [Scott Orr](#); [SonCo\\_LCP.Update2020](#)  
**Subject:** SSC LCP Open Space and Resource Conservation Recommendations  
**Date:** Wednesday, March 23, 2022 12:35:12 PM

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## EXTERNAL

Esteemed Commissioners and Permit Sonoma Director and Staff,

This document is a tad long. You can get a speed-reading gist by skipping to the red and blue comments and reading background for clarification only as needed.

Thank you so much for your attention to this important information in advance of the next Hearing tomorrow.

Laura,  
for *Save the Sonoma Coast*

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

**Warning:** If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.



## **SSC's LCP Public Facilities and Services Recommendations**

**(Please note the mis-numbering of pages in this Element)**

**Page PF-5, 3.1 WATER SERVICES:** “The Sonoma Coast is a water scarce area, and developing reliable water sources for urban development is very difficult. Several wells or springs may be needed to produce even modest water yields. Most of the water systems on the coast are small and substandard in some respect. The main problems are insufficient water and limited financial capability. Water sources are generally wells or creeks which may run low in summer months when demand is highest. Most coastal wells produce only a limited amount of water at any time due to the geology of the area. The owners of small water systems cannot afford extensive search for and development of additional water supplies.”

**Comment:** “Generally, the coast is a water-scarce area, and land conditions are poor for septic systems. This lack of basic services limits development potential in most areas. The Sea Ranch and Bodega Bay become the main growth areas. Because the coast has a small population spread over large distances, emergency and education services are limited. It is not expected this situation will change substantially in the future.” -from the 1981 LCP

Nothing has improved in the way of water supply on the Coast in the past 41 years. To the contrary, with increased tourism and climate change effects on rainfall, the unregulated distribution of underground aquifers is a zero-sum game for all life forms in the Coastal Zone.

**Recommendation:** **Accept the reality of progressively limited water resources. Attempts to extend human reach into the aquifer with more expensive technology and multiple well-drilling sites is a disservice to future generations of coastal life forms, including human.**

**3.1 Water Services, 3rd paragraph:** “Water system development and improvement continues at The Sea Ranch, Timber Cove, Sereno del Mar, Carmet, and Bodega Bay. Water supplies sufficient for subdivision buildout or moderate additional expansion appears limited to these five areas and Duncans Mills.”

**Comment:** The most recent Municipal Service review of the Bodega Bay District by LAFCO was in 2004.

**Recommendation:** Updated policy for water needs of any new development should be based on most current data and science and its potential impact on existing water resources and facilities.

**Page PF-5, Policy C-PF-2a:** “Growth and development shall be planned in accordance with existing water and wastewater treatment and disposal capacities and facilities in accordance with California Coastal Act. Development, including land divisions, shall be prohibited unless adequate water and wastewater treatment and disposal capacities and facilities exist to accommodate such development. In acting on any Coastal Development Permit, determine that adequate capacity is available and reserved in the system to serve Coastal Act priority land uses (i.e., coastal-dependent uses, agriculture, essential public services, and public recreation; see Land Use Element, Table C-LU-2). In areas with limited service capacity, new development for a non-priority use, including land divisions, not specified above shall only be allowed if adequate capacity remains for Coastal Act priority land uses. (NEW)”

**Comment:** This policy does not clearly address how growth and development are possible, given the coastal water shortage. It also does not specify where the water will come from or how to determine that adequate capacity is “available and reserved”.

**Recommendation:** Insert ...."facilities exist on-site to accommodate.....".

**Add:** "Outside Service Agreements for wastewater and septic treatment should be the last option and only if all other options for onsite disposal allowed by Public Health and the Basin plan are not feasible."

**Policy C-PF-2b:** “A public water or wastewater district shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with the Local Coastal Plan in accordance with California Coastal Act Section 30254. New development within the service boundary of a public water or wastewater district shall be required to connect to the district for water or wastewater service. (NEW)”

**Page C-PF-6: Policy C-PF-2e:** “Extension of public sewer services outside of the boundary of The Sea Ranch and Bodega Bay Urban Service Areas shall be **avoided**. Exceptions to this policy shall be considered, to the extent allowed by law, only:

(1) Where necessary to resolve a public health hazard resulting from existing development (i.e., contamination of land, surface water, or groundwater resulting from failure of an existing OWTs or other wastewater management system); or **(2) Where appropriate to allow for development of public park or recreation facilities. A Coastal Permit shall be required for extension of public sewer services outside of an Urban Service Area.**

Where several failing OWTs or other health and safety problems which pose a significant hazard to human health and safety exist outside an Urban Service Area that could be addressed by extension of public sewer service, use Outside Service Area Agreements which limit the use of existing development. The evaluation should assure sufficient capacity to serve existing connections and potential buildout in the existing Urban Service Area.

**A Coastal Development Permit shall be required for extension of public sewer services outside of an Urban Service Area. (GP2020, REVISED).**

**Comment:** These policies differ from the last LCP radically in allowing for development outside of designated urban service boundaries. In our experience, ***Coastal Development Permits have not been hard to obtain.***

**Recommendation:** Delete Exception (2) altogether, outright.

The current LCP template for development permits should be retained, eg: "Ensure that adequate water capacity is reserved to serve (the first three) priority developments (listed below as they are proposed in the Phase I development plan for Bodega Bay,) by requiring that if water supplies do not prove adequate to all land uses designated in the Phase I plan, a minimum of 30 percent of the projected available amount shall be reserved for the designated priority uses.

*Maintain the 2001 LCP's limitation of new public water and wastewater systems to within designated urban services boundaries. In cases in which several septic systems fail in a cluster, rather than extending sewer services outside urban boundaries, an invitation to sprawling development, require onsite wastewater treatment systems.*

**Page PF-7, Policy C-PF-2f:** "The following guidelines shall be used for any exception allowed by Policy C-PF-2e:

(1) The property must adjoin the Urban Service Area Boundary, or the proposed **connection to a public sewer system must be no more than 200** feet from the Urban Service Area Boundary;

- (2) Size sewage facilities to serve development consistent with the Local Coastal Plan;
- (3) Require written certification that adequate service capacity is available for the use to be connected to the system; and
- (4) Use agreements, covenants, and zoning to **limit the growth inducement potential** of extension of public sewer services. (GP2020 REVISED)

**Comment:** *This policy further acknowledges that there will be discretionary development allowed outside Urban Service Areas.*

**Recommendation:** Reduce the distance for the connection to public sewage to no more than 100 feet. Change the word “*limit*” to the word “*prevent*”.

**Policy C-PF-2g:** “Extension of public water service to a property that is outside the boundary of an Urban Service Area or Rural Community (i.e., Duncans Mills, Jenner, Sereno del Mar, Carmet, Salmon Creek, Timber Cove, and Valley Ford) shall be **avoided. Exceptions to this policy shall be considered**, to the extent allowed by law, only:

(1) Where necessary to resolve a public health hazard resulting from existing development (i.e., failure of water wells or contamination of land, surface water, or groundwater resulting from failure of an existing OWTS or other wastewater management system); or

**(2) Where appropriate to allow for development of public park and recreational facilities.**

A Coastal Permit shall be required for extension of public water service. (GP2020)

**Comment:** *It is clear that under these exception policies, a private property recreational concession could access urban services by declaring the development “public”.*

**Recommendation:** Delete (2).

**Policy C-PF-2h:** **The following guidelines shall be used for any exception allowed by Policy C-PF-2g:**

(1) Size facilities to serve development consistent with the Local Coastal Plan;

- (2) Require written certification that adequate service capacity is available for the use to be connected to the system or planned to be connected in the future;  
and
- (3) Use out-of-service area agreements that limit the use to existing development rather than annexations (GP2020)

**No Comment.....**

**Policy C-PF-2i: “Applications for subdivision of land or new development or uses within a water or wastewater service area shall be required** to include written certification from the service provider that existing water and wastewater services are available to serve the new parcels, development, and uses;

**Comment: This policy clearly indicates that subdivision and development are being welcomed in the Coastal Zone.**

**Recommendation: Drop “or that the service provider will make improvements to the water or wastewater systems necessary to accommodate the new development and uses prior.”**

**Page PF-8,Policy C-PF-2i: New privately owned package treatment plants** which serve multiple uses or serve separate parcels shall be **avoided**. Use of package treatment plants **to serve affordable housing or other projects** on a single parcel under one ownership shall be allowed provided that they comply with the following criteria:

- (1) The package treatment plant must comply with water quality and health standards and protect water resources;
- (2) The design and appearance of package treatment plants located in agricultural and other rural areas must be compatible with the rural area’s character;
- (3) The project must include provisions for the long-term operation, maintenance, and eventual replacement and/or removal of the package treatment plant; and include adequate financing for these provisions through bonds, sinking funds, or other mechanisms; and
- (4) The package treatment plant is not to be used as a basis for approving a new affordable housing development in Rural Communities or on other rural land, or amending the Local Coastal Plan to allow for more intensive development.  
(GP20

**Comment:** The words “or other projects” are undefined and leave a loophole for development other than that of affordable housing.

**Recommendation:** Change the first sentence to: “**New privately owned package treatment plants which serve multiple uses or serve separate parcels shall be limited to the service of affordable housing only.**”

**Policy C-PF-2p:** “Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development in accordance with California Coastal Act Sections 30222 and 30254. **The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority consistent with coastal priority land uses of the Coastal Act. (NEW)**”

**Comment:** Per Peter Benham’s comments on Land Use categories, reminding us of priorities as stated in the Half Moon Bay LCP: “**3. Priority Land Uses. Define priority land uses and support development of such land uses throughout the City by the following categories:**

- a. Coastal Act Priority Uses: Coastal-dependent uses, agricultural uses, visitor-serving commercial uses, and coastal access and recreational facilities. Coastal Act Priority Uses are considered top tier priority in this LCP; and **furthermore, as consistent with Coastal Act Section 30222, coastal-dependent industry and agriculture take precedence over all other uses including visitor serving uses.**”

**Page PF-24, 11.2 OTHER INITIATIVES, Other Initiative C-PF-1:** “Consider preparation on a regular basis of a total water supply and use budget for the Sonoma County Coastal Zone to aid in land use planning and decision-making. Encourage Coastal Zone water service providers to prepare individual water supply and use budgets on a regular basis to provide the necessary information for the total water supply and use budget. (NEW)”

**Recommendation:** **Utilize CDWR and County Water Board guidance in formulating any aquifer estimates and long-term sustainability of local water supplies.**

RICHARD A. CHARTER

February 16, 2020

Comments on Local Coastal Plan Update  
Att'n: Ms. Cecily Condon  
Permit Sonoma  
2550 Ventura Avenue  
Santa Rosa, CA 95403

Submitted to: [PRMD-LCP-Update@sonoma-county.org](mailto:PRMD-LCP-Update@sonoma-county.org)

Dear Cecily:

Thank you for this opportunity to provide written comments on the County of Sonoma Local Coastal Plan Update and for the opportunity to attend your local briefings on this topic throughout the County.

Today's Sonoma County Local Coastal Plan is the cumulative product of several generations of ordinary citizens who worked with their local elected officials to successfully protect a global natural treasure. The people who have in the past shaped the preservation of the Sonoma Coast have never left us, their lives and legacies are woven even into the local placenames and hiking trails found in our Coastal Plan, while their accomplishments unite us in the continued preservation of this place.

As a source of spiritual solace and human inspiration, the Sonoma Coast has accumulated millions of friends from around the world. The County of Sonoma itself is tasked with serving as a steward on behalf of our coast's planetary constituency. We rely on the Local Coastal Plan to protect places and resolve threats since it provides clear jurisdiction over Sonoma County's immediate environment and coastal economy. Local control is even more important at this time when the National Environmental Policy Act, the federal Clean Water Act, the Endangered Species Act, and the Migratory Bird Treaty Act are all facing substantial erosion due to federal

regulatory rollbacks. Even weakening amendments to the California Coastal Commission's underlying Coastal Zone Management Act have been proposed in a rulemaking that would, if adopted, severely limit the role of coastal states in "federal consistency" determinations affecting anticipated federal actions, including offshore oil and gas lease sales and drilling rigs along our coast. The one constant in the present phase of the ongoing tug-of-war over the Sonoma Coast is the overarching public support for maintaining a robust Local Coastal Plan and strengthening it where necessary, while bringing the LCP current to address entirely new issues that are only now emerging.

Therefore, the timely purpose of the present "Update" to our LCP is to preserve, improve, protect and restore the iconic natural, cultural, and public access resources of the Sonoma County Coastal Zone in the context of current challenges:

### **1) Environmentally-Sensitive Habitat Justifies Special Consideration in the LCP:**

At the very heart of the overarching statewide *California Coastal Plan* is the explicit mandate to protect *Environmentally Sensitive Habitat Areas*, or ESHA. ESHA can take many forms, manifesting as wetlands, river estuaries, meadows, forests, chaparral, beaches - we have them all. The dramatic values represented by our viewsheds - the "optics" of this coast - are inarguably spectacular, and since we first created a Local Coastal Plan, have been identified as *Scenic Landscape Units*, or SLU's. One of our coast's most important remaining undeveloped and agrarian open space SLU's is the fragile Scotty Creek and Gleason Beach watershed, where Caltrans is proposing the construction of a three-quarter-mile-long Highway One realignment - including an oversized elevated concrete bridge to cross ten-foot wide Scotty Creek - thus unnecessarily overlaying our viewsheds with an intrusive industrial edifice that would become the largest manmade structure on the Sonoma Coast. This unique natural setting incorporates a surviving ranch house and century-old farmstead emblematic of the original influx of new settlers who came to our county - a location that has gained state historic recognition. The Scotty Creek Valley also shelters numerous diverse native archaeological features, including culturally-important village sites. The pending Caltrans proposal, as it now stands, is in noncompliance with the LCP's guidelines on *Historic Landmarks and Uses, Section 10.1.5*. The recent "mitigation" acquisition by Caltrans of a small nearby .65-acre



beach parcel may represent a step in the right direction, but it does not protect more than a small fraction of Gleason Beach. Fully engaged oversight of this Caltrans proposal needs to be undertaken by the County itself, since it remains the most significant industrial project now pending on the Sonoma Coast. This unique site deserves a careful design review of any associated bridge or appurtenance to protect the visual and hydraulic values of the viewshed integrity and watershed and wetland functions of the sensitive SLU in which it is being proposed. The County should not simply subrogate decisions that will eradicate the viewsheds and fragile SLU values here by surrendering their oversight to distant public works agencies.

## **2) Enhanced Onshore Industrial Facilities Ordinance Related to Offshore Drilling and Other Commercial Exploitation of the Ocean:**

During 2019, a new Administration in Washington, DC unveiled an aggressive new federal Five-Year Outer Continental Shelf (OCS) offshore drilling plan. This plan includes six offshore drilling lease sales extending along the entirety of the California coast, including two OCS lease sales proposed for the region inclusive of the Sonoma Coast. This offshore drilling plan is presently temporarily “on hold” due to a successful Court challenge brought by the conservation community and others. After November 2020, however, this offshore oil and gas leasing plan is expected to advance rapidly, with commensurate implications for our Sonoma Coast.

Sonoma County voters in 1986 wisely adopted a ballot measure intended to help protect the Sonoma Coast from offshore oil and gas leasing by making our coastal lands inhospitable to the petroleum industry as it pursues the construction of onshore petroleum processing facilities and staging areas to support offshore drilling. The resulting *Sonoma County Ordinance Number 3592R* remains, as it should, appropriately embodied in the current Update of the LCP. Strengthening language to reinforce and improve this ordinance is now necessary, particularly given the fact that the northern expansion of the Greater Farallones National Marine Sanctuary that protects the Sonoma Coast from Bodega Head northward remains under review by the current Administration and, as a result, the permanent ban on offshore drilling within Sonoma County’s nearshore coastal waters could be rescinded at virtually any time. Further, recent actions by the White House Council on Environmental Quality (CEQ) have substantially

weakened the role of state and local governments in federal offshore drilling decisions affected by NEPA and CZMA, as noted herein.

Strengthening the existing offshore drilling facilities ordinance in our county is also necessitated by the recent advent of offshore floating wind electrical generating turbine arrays and potential offshore wave energy devices. These emerging industries can be expected to lead to commercial proposals for massive undersea electrical cable clusters connecting to other types of infrastructure and onshore facilities here that would also be equally incompatible with the non-industrial character of our communities. Bodega Bay represents the only fully-sheltering maritime port on this stretch of coastline, and therefore it could again become a target for offshore oil developers who are rapidly shifting to pursuing floating offshore wind energy, such as the petroleum exploration company Statoil, now known as Equinor. For this reason, a broader interpretation of the *onshore facilities* language should be undertaken in the LCP Update to protect lands along our coast that would otherwise be vulnerable to subsea cable landfalls, new onshore electrical switchyards and distribution substations, and onshore staging areas for the offshore floating wind industry now being planned in federal waters lying off of counties to our north.

### **3) Existing Coastal Waters Protections Need to be Acknowledged and Identified in the LCP:**

The Sonoma Coast's nearshore waters enjoy national and state protections which should be fully reflected in the LCP. The boundaries of the longstanding *Farallones National Marine Sanctuary*, extending as far north as Bodega Head, have been expanded by NOAA as the new *Greater Farallones National Marine Sanctuary*, and these protections are now fully inclusive of the entire Sonoma Coast, extending as far north as Alder Creek near Pt. Arena in Mendocino County. The shoreline segment from Bodega Head to Alder Creek remains "under review" by the current Administration, with no indication of whether, or what type of, potential boundary alterations or regulatory changes might eventually be forthcoming. The Sonoma Coast also hosts a number of *State of California Marine Protected Areas*, or MPA's, which serve as marine life restoration zones. The LCP should take these MPA's into account in terms of shoreside land use planning. The LCP Update needs to also incorporate consideration of the elements of the *California Coastal National Monument* that lie along the Sonoma Coast,

including the appropriateness of proposed shoreline public access points for that National Monument along our coast.

#### **4) The Vacation Rental Industry Should Not Continue to Displace Permanent Residents from Local Communities nor Undermine Public Safety:**

The Update of the LCP needs to acknowledge that our coast now has a substantial transient population with varied behavioral and ethical standards. The ready availability of computerized advertising and reservation systems has generated a rapid spread of the VRBO industry so that in places it now displaces formerly peaceful family-oriented coastal residential communities, and the result is not always beneficial. There are obvious social and economic costs accruing to our neighborhoods from the VRBO sector that have proven to adversely affect public safety and which sometimes threaten our communities' valued traditional quality of life. Coastal vacation rentals may seem at first to provide an inevitable and profitable method of providing lodging to the growing number of visitors to our coastal attractions, but various outlaw activities uncharacteristic of our coastal community have occurred in association with vacation rental uses in Taylor Tract in Old Town Bodega Bay, as exemplified by, (<https://www.pressdemocrat.com/news/4281941-181/woman-shot-wounded-in-bodega>), and in the nearby Bodega Harbor Subdivision, (<https://www.pressdemocrat.com/news/9770962-181/sonoma-county-deputy-shoots-assault>). Visitors exhibited in these situations an instance of domestic violence followed by a suicide, and, more recently, a case involving attempted manslaughter via vehicular assault that resulted in eight injuries of innocent bystanders and ended in a police-involved shooting. These tragic occurrences, while high-profile exceptions to the idealized norm promoted by the vacation rental industry, provide compelling evidence that guests utilizing VRBO properties are not being adequately screened and that the composite of short-term-rental properties are not currently being responsibly overseen by diligent nearby accessible management. Sadly, in spite of the high stakes in terms of public safety, the County is not yet following through to ensure that the kind of responsible management necessary for these kinds of emergent land uses is consistently maintained. A quiet residential neighborhood should not be converted into a virtual industrial park of quasi-motels, even if the influx of new industry is aimed at serving visitors. The contribution that increasing VRBO demand is playing in compounding the scarcity of available housing

for local service staff and fishery workers who cannot now find an affordable place to live near the coast also makes it only prudent that the kind of reasonable oversight principles already applied to vacation rentals elsewhere in Sonoma County need to also be governing coastal properties as well, including but not limited to:

- a) Limit the total number of vacation rentals at the coast.
- b) Provide a community with the option of becoming an exclusion zone free of vacation rentals.
- c) Maximum occupancy rates not to exceed two persons per bedroom, plus an additional two persons.
- d) 24-hour management must be available.
- e) Each vacation rental location must demonstrate that it has adequate onsite parking on its own parcel, reliable garbage service, and noise must be controlled during quiet hours.
- f) The “three strikes” principle utilized elsewhere in Sonoma County must be applied at the coast, i.e.; three verified violations at one property should lead to a one-year hiatus in vacation rental uses at that site.

The Sonoma Coast generates substantial revenue to the County from TOT taxes and other sources, but legitimate coastal needs do not yet receive their fair local share of collected revenues in return to support important first-responder services whose time is increasingly spent dealing with visitor-related emergencies. It is now abundantly clear that the Sonoma Coast LCP needs to adapt to this influx of VRBO properties, and the LCP Update now in preparation therefore must exert some reasonable controls over this industry, as has become necessary and is proving effective in other Sonoma County Supervisorial Districts, particularly in neighborhoods near the town of Sonoma where it became obvious that the community had simply reached a “critical mass” of VRBO’s.

### **5) The Dangers of Providing Too Much Staff Discretion in Administering the LCP:**

There should be no discretionary “loopholes” carved out of the LCP for special interests, as is the case with the current public draft. One clear crosscutting problem that must be highlighted is that for almost every single land use provision throughout the LCP Update public review draft, there is inexplicably granted to Permit Sonoma planning staff a very wide margin of

discretion in terms of interpretation and implementation. This undue level of staff discretion invades virtually all facets of the LCP, from allowances for exceeding building height limits between Coast Highway One and the ocean to protect important viewsheds, to arbitrarily enabling circumvention of requirements for adequate public health buffers for expanded or new septic system setbacks from existing domestic wells in older subdivisions, to potential overexpansion of commercial enterprises and even new expansion of some of our existing small towns, if additional water supply and/or wastewater treatment capacity were to be added. The consistent administrative treatment of all Coastal Permit applicants, without the present practice of granting of biased access gained through retaining expensive consultants who are sometimes former County staff, must particularly apply to inappropriate proposals for rural commercial event centers in agricultural settings and to all other threats to conservation lands, safe communities, and open space protection.

#### **6) The LCP is Not Interchangeable with the Countywide General Plan:**

In the context of the LCP Update, General Plan 2020 is not arbitrarily transposable to the Sonoma Coast. Transmigration of some of the more concerning aspects of the Countywide General Plan into the LCP should not take place now, nor should it be enabled in the undefined future. Our coast is a unique and irreplaceable asset and deserves the kind of profound respect and due care that it was accorded during the thorough public process by which the first Sonoma County LCP was initially formulated and adopted.

#### **7) Fishing First:**

Our fishing infrastructure and related maritime support facilities are not expendable. Ports on our North Coast are few and far between. The LCP Update public draft unfortunately would appear to open the door to random conversion of commercial fishing-related residential opportunities into what the General Plan calls “affordable housing”, which would no longer, as we interpret the present public review version of the document, need to be prioritized for fishing families as before. The same prioritization for fishing families should be the case with the LCP-described plans for an extensive additional RV park. Commercial fishing and supporting uses were acknowledged by the drafters of the original LCP as a priority land use in our coastal towns, and should remain so. When decisionmakers talk about

building affordable housing at the coast, we know from past experience that the vacation rental industry's unrelenting economics will ultimately determine the eventual use of the aforementioned "affordable housing". Whether a particular property has a stated intent at the outset of being used as a VRBO or not, the odds are high that it will eventually be converted into one.

### **8) Necessity of a Rodenticide Ban in the LCP:**

"Second-generation" anti-coagulant rodenticides should not be used in the Coastal Zone, due to their proven propensity to biomagnify and dangerously bioaccumulate in the food chain. Other coastal jurisdictions in California are now contemplating and adopting prohibitions on the application of these substances to protect terrestrial predators, raptors, pets, and children. Compounds that already have been precluded from retail sale in the State of California should not be used within the Coastal Zone of Sonoma County. In this regard, Malibu has recently adopted language in their own LCP that should be customized for adoption in the Sonoma County LCP. Neighboring Marin County has a well-established *Integrated Pest Management Plan*, parts of which can serve us as a ready model in Sonoma County. Policies that enable the indiscriminate and inhumane cumulative poisoning of our coastal hawks, gulls, and other valued wildlife represent an obsolete vestige of past ignorance. The emergence of promising contraceptive baits for pest control is now being approved by EPA and these non-toxic compounds pose none of the food-chain amplification hazards of conventional anti-coagulant compounds.

### **9) Sound Forestry and More Protective Mining Policies Need to Underpin the Health of Our Coast:**

The LCP Update section on *Timber Land Use Areas* needs to be reconfigured and improved to grant additional oversight over the location and methods of conduct of forest practices to the County of Sonoma, rather than perpetuating an over-reliance on antiquated Permitted Uses within *Timberland Production (TP)* or *Resources and Rural Development (RRD)* categories. The County of Sonoma needs to stop consenting to CalFire's free reign over review and approval of proposed *Timber Harvest Plans (THP's)*, particularly in the Coastal Zone. The County should also be the final arbiter of vineyard conversions of forestland, as well as standing as the primary responsible steward in protecting our hypersensitive riverine

floodplain habitats. The LCP reflects overarching stewardship values that should be at the core of any Sonoma County evaluation of pending THP's. To do otherwise simply ignores the underlying importance of how we collectively treat our timberlands as a key to maintaining the viewsheds and the often erosion-prone watersheds along our coast. Timber harvests in the Sonoma County Coastal Zone are not always compatible with the identified *Special Treatment Areas* adopted by the Coastal Commission on July 5, 1977. *Special Treatment Areas* are forest areas designated within the Coastal Zone that constitute a significant wildlife and/or plant habitat area, area of special scenic significance, or any land where timber operations could adversely affect public recreation areas or the biological productivity of any wetland, estuary, or stream deemed especially valuable because of its role in a coastal ecosystem.

With respect to hard rock mining proposals in the Coastal Zone, the *Cheney Gulch Mineral Resources (MR)* interest area should not be allowed to be opened to mining, given the known propensity of the area for both gully and sheet erosion and geologic instability. The associated transportation mechanisms for any produced rock, and the high visibility of any resultant mining scars from Coast Highway One (*Policy C-OSRC-10a*), are additional considerations that argue against quarry development at this site. A large cross-country automated conveyor apparatus, proposed for the Cheney Gulch region in recent mining plans and leading to a crushed rock loading facility for transit by barges out of Bodega Bay also poses the threat of harmful maritime slurry spills and vessel collisions in our busy harbor.

### **10) Establishing Durable Historic and Cultural Preservation Districts:**

Many of our local coastal communities are uniquely representative of our region's rich cultural history and this historic record should be protected, even as restoration or reconstruction of existing individual residential structures occurs. This approach needs to expand on the present *Historic Combining Zoning Districts (HD)* first recognized in 1974. More of our coast's smaller coastal residential communities should be treated as historic preservation districts in which incompatible or intrusive structures are discouraged, and as places where appropriately-scaled buildings of compatible design should be prioritized. Otherwise, we will continue to incrementally lose the character of our coastal communities, one street and one building at a time.

**11) Traffic Studies Needed for Any Substantial New Development:**

We know that the Sonoma Coast is becoming an increasingly desirable destination for visitors from around the world. The upside of this increased popularity as a tourism destination is a more stable year-round business climate for our coastal economy. But when weekend traffic jams extend through our towns and paralyze our narrow local roads in gridlock, the result is not good for business, obstructs emergency first responders, and makes the tasks of day-to-day life problematic for local permanent residents. The updated LCP should pay more attention to exploring appropriately-sited left-turn lanes, intelligent traffic and visitor parking management, and alternative transportation modes, lest clogged rural transportation routes that were originally designed to accommodate horse-drawn wagons unsurprisingly come to a halt on many busy holiday weekends. While we all love bicycles and support their use for healthy coastal access, planning policies that can eventually relocate the increase in bicycle traffic off of our narrow, shoulder-free, Coast Highway One wherever possible, in the interest of both bicycle and vehicular public safety, should be a higher priority in the LCP Update.

**12) Spheres of Influence, Town Growth Boundaries, and Preserving Open Space:**

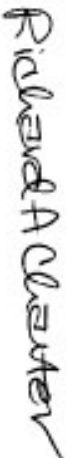
The coastal environment is defined by open space and the vistas and ambience that such open space provides. As any future proposals for additional residential or commercial development are evaluated by Permit Sonoma, firm boundaries that define our existing communities should be maintained to prevent intrusion into surrounding wildlands and sustainable agricultural land uses.

In summary, the current update of the LCP should continue to integrate the input of coastal communities, organizations, and local citizens into the review and revision process in order to produce a comprehensive Local Coastal Plan Update that truly protects our coast and one that works in the best interests of the people and places of Sonoma County and their global constituency.

Thanks for your consideration.



Sincerely,

A handwritten signature in black ink that reads "Richard Charter". The signature is written in a cursive style with a checkmark at the end.

Richard Charter  
Senior Fellow  
The Ocean Foundation  
6947 Cliff Avenue  
Bodega Bay, CA 94923  
waterway@monitor.net

cc:  
Supervisor Lynda Hopkins, County of Sonoma  
Ms. Stephanie Rexing, California Coastal Commission

## CALIFORNIA COASTAL COMMISSION

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January 8, 2007

Bill Dutra, Chief Executive Officer  
The Dutra Group  
1000 Point San Pedro Road  
San Rafael, CA 94901

Re: Proposed Quarry Expansion Project – Bodega Bay Area

Dear Mr. Dutra:

We appreciate you and your colleagues taking time to meet with us to discuss issues and concerns raised under the California Coastal Act and Sonoma County's local coastal program (LCP) in connection with the proposed quarry expansion project on the Hagemann and Calvi properties in the Bodega Bay area of Sonoma County.

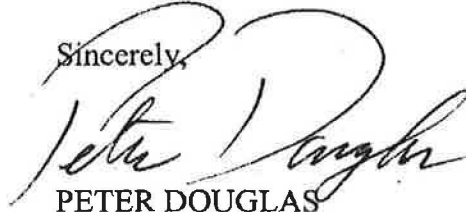
This letter is to confirm the position we expressed during our meeting. Because of major conflicts we identified relative to coastal resource protection policies set forth in both the County's LCP and the Coastal Act, we see no way this proposed project could be recommended for approval by the staff to the California Coastal Commission. Among the coastal resource protection policies that would be contravened and necessitate a negative recommendation are the following: Agricultural zoning and Williamson Act protections on the Calvi property; major landform alterations; adverse impacts to habitat that may include environmentally sensitive habitat or streams; visual resource protections; impacts on public access and recreational resources; marine resource impacts; air quality; conflicts with commercial fisheries and recreational boating; and conversion of unique character of special coastal community (i.e., Bodega Bay).

As we discussed during our meeting, these issues are only those identified based on a cursory and preliminary review of the proposed project and are undoubtedly not exhaustive of all applicable coastal resource protection policies that would be raised by the proposed project. I appreciate your desire to hear directly from us. I also applaud your early consultation with us and only wish other coastal project proponents would be as reasonable and responsible. It would indeed be unfortunate if you were to expend considerable financial resources pursuing a project

that, at the end of the day, is not approvable consistent with California coastal resource protection policies.

If you have any further questions about this matter, please don't hesitate to contact Rebecca Roth, our District Manager, or Charles Lester, our District Director.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Douglas". The signature is fluid and cursive, with a large initial "P" and "D".

PETER DOUGLAS  
Executive Director

cc: Mike Reilly, Commissioner  
Gary Giacomini

## **LCP Noise Element Recommended Changes and Rationales**

### **1) Recommendation: Re-instate the 2019 LCP Draft Noise Element in the LCP Draft.**

**Rationale:** When the 2019 Noise Element was deleted from the 2021 draft, important information regarding the effects of noise on people and accompanying policy was deleted. This should be recovered. Effects of “anthropogenic” (man-made) noise on people themselves is unaddressed in the 2021 Draft LCP.

**2) Recommendation:** review and incorporate the model noise ordinance applying to Montgomery County, Maryland (<https://www.montgomerycountymd.gov/DEP/contact/noise.html>).

**Rationale:** According to Arthur Popper, PhD, editor of *Acoustics Today*, this is one of the most science-based and user-friendly community noise policies in the United States.

**3) Recommendation: Permit Sonoma staff with wildlife and ecology training and experience review “*Effects of Anthropogenic Noise on Animals*”, a 2018 co-publication of Springer and the Acoustical Society of America, and the international journal “*Acoustics Today*” annually.**

**Rationale:** There has been much research done worldwide in the rapidly emerging field of human-caused noise and vibration effects on animals. Because the LCP will determine coastal policy for the next 20 years, we request that Permit Sonoma staff with wildlife ecology training and experience review the text and journal mentioned above on an annual basis. New science relevant to sound and vibration effects on terrestrial and marine wildlife may then inform them of any necessary amendments to the LCP Noise Policy.

**4) Recommendation:** Under section 1.3 in the Noise Element, include “ESHAs” as noise-sensitive *areas* (rather than as a “*use*”).

**5) Recommendation:** Under section 2.2.1, add “(6) Construction” and “(7) Manned and Unmanned Aircraft (Drones)”.

**6) Recommendation:** Add Section 2.3 to the Noise Element: “Noise and Its Effects on Animals and Habitat”.

We suggest paraphrasing “Why Sounds Matter”, from the Point Reyes National Seashore website (<https://www.nps.gov/subjects/sound/soundsmatter.htm>) as both rationale and introduction:

“Natural sounds are part of the resources vital to coastal ecosystems. Such sounds comprise communication critical for wildlife in natural habitats, an immersive experience for visitors and a peaceful environment for residents.

Animals depend on hearing natural sounds in the environment for a range of activities, including:

- Communication
- Establishing territories
- Finding habitat
- Courting and mating
- Raising families
- Finding food and avoiding predators
- Protecting their young”

**7) Recommendation:** Add to GOAL C-NE-1: “Protect people, *animals, environmentally sensitive habitat*, and land uses from the adverse effects of exposure to excessive noise....”

**Rationale:** Scientific evidence has demonstrated a clear pattern of potential harm to every species of marine or terrestrial animal by excessive noise.

**8) Recommendation:** Add “Objective C-NE-1.5: “Protect the unique sound environment of the rural coastal zone to sustain a

healthy coastal ecosystem and quality human experience there for future generations.”

**Rationales:** Wildlife and habitat require similar protection as people do from the potential deleterious effects of noise and vibration : [https://www.researchgate.net/profile/Rouven-Schmidt/publication/337401780\\_The\\_effects\\_of\\_anthropogenic\\_noise\\_on\\_animals\\_a\\_meta-analysis/links/5ddaaec4458515dc2f4b699a/The-effects-of-anthropogenic-noise-on-animals-a-meta-analysis.pdf?origin=publication\\_detail](https://www.researchgate.net/profile/Rouven-Schmidt/publication/337401780_The_effects_of_anthropogenic_noise_on_animals_a_meta-analysis/links/5ddaaec4458515dc2f4b699a/The-effects-of-anthropogenic-noise-on-animals-a-meta-analysis.pdf?origin=publication_detail)

**9) Recommendation:** In place of Policy, Objective C-NE-1.5 continues: “In temporary lieu of research-based, specific, protective Policy with a to effects of noise and vibration on multiple species of wildlife, the Precautionary Principle will be followed:”

“The precautionary principle in modern environmental science is the guideline for environmental decision making and has four central components: taking preventive action in the face of uncertainty; shifting the burden of proof to the proponents of an activity; exploring a wide range of alternatives to possibly harmful actions; and increasing public participation in decision making (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1240435/>).”

Include as reference, “Soundscape Ecology of the Anthropocene”, by Hans Slabbekoorn, PhD, from “*Acoustics Today*” Spring, 2018 (<https://acousticstoday.org/soundscape-ecology-anthropocene/>).

**Rationale:** During direct communication with Arthur Popper, PhD, editor of *Acoustics Today* on November 2, 2021, we learned that the shifting research and technological environment with regard to noise and vibration effects on wildlife requires utilization of the Precautionary Principle rather than premature statements of policy. The article above was also recommended as a reference by Dr. Popper.

**10) Recommendation:** Add “Policy C-NE-2f: Overflight altitudes shall be no lower than 1000 ft elevation over the coastal zone.”

**Rationale:** This is current Greater Farallones Marine Sanctuary regulation for our coastline.

**11) Recommendation:** Add “Policy C-NE-2g: Unmanned aircraft (drones) shall not be flown over ESHAs.”

**Rationale:** This is current Sonoma Coast State Parks regulation, which governs similar and adjoining habitat to rural and open space areas of the coastal zone.

**12) Recommendation:** Change in “The following policies shall be used to achieve these objectives:” to “The following policies shall be used to achieve objectives C-NE-1.1 through C-NE-1.3.

**Rationale:** Objectives 1.1 and 1.2 are duplicate.

**13) Delete Policy C-NE-1c(4)**

**Rationale:** This policy assumes permitting of races or concerts 6 days per year with attendant increased noise allowances. This would be fitting for the General Plan but not the Coastal Zone.

**14) Delete Policy C-NE-1c (5)(b)**

**Rationale:** This Policy recommends treatment of open space as a noise buffer. This would be fitting for the General Plan but not the Coastal Zone.





## **LCP Land Use Element**

- 1) **The population projection on page 3 of the 2019 Draft, all the public has been given access to, is excessive** and drives much of the development language in this Element. It should be lowered, as should be the development emphasis. ("The amount of land shall be consistent with the population projected.....". There is a major discrepancy between the population increase projected by the "General Plan for the Sonoma Coast", which is itself an inappropriate application, of "11,700 new residents by 2020" and the total population of 3,359 projected by Permit Sonoma GIS Community Profile for 2023);
  
- 2) **Inappropriate conversions, amendments and inordinate discretionary powers by Permit Sonoma have lead to development out of keeping with directives by the California Coastal Commission.**

Applications for Local Coastal Plan Amendments have been approved by Permit Sonoma, correlated to financial incentives accrued by the department under the provision of "At Cost" assistance by planners to wealthy developers. This historically leads to both falsification of information given to the Commission, resulting in "de minimus" designation, or project approval against Coastal Commission directives. The built-in incentive to abet development along with Permit Sonoma discretionary power should be abolished for the sake of defined Coastal Zone resource conservation. Additionally, applications should be publicized as they are filed, along with disclosure of all communications and billings between developers and PS staff with real-time participation by the public and the CCC.

- 3) **The Land Use maps are very old (20-25 years) and are no longer accurate;**

4) **New development, including land divisions, for a non-priority use is already anticipated**, as is evidenced by Appendix A.

Discretionary new development should be prohibited, whether or not there is theoretical water and wastewater capacity for it, let alone providing additional water (Policy C-LU-4c). As the effects of climate change escalate, so does the need for groundwater and biotic conservation and prevention of erosion and groundwater contamination. Emergency services and roadway transportation are already inadequate to serve the needs of coastal residents and visitors.

5) **Bodega Bay has insufficient water for high-density housing and should not be subject to more well-drilling in a known zone of extremely scarce groundwater** (“Adequate water, sewer, public safety, park, school services, and other necessary infrastructure are available or *planned to be available*.”) This language is an open door for inappropriate development approval.

6) There should be early (eg, prior to full application) MAC, general public and Coastal Commission notification and public vote on any developments proposed within areas of Principally Permitted Use;

7) **Under the broad definition of "resource-dependent", even an activity as destructive as aggregate mining could theoretically be approved in ESHA.** Clearing of vegetation, grading, excavation, fill or construction, even for resource-dependent uses, should be prohibited in ESHA;

8) **Development of Planned Communities in the Coastal Zone with tennis courts and golf courses is untenable** for multiple reasons (eg, inadequate water supply, impacts on wildlife, viewscape, erosion, etc) and should be prohibited from the coastal zone entirely;

9) **Onshore support facilities for any form of offshore energy generation, such as wind and wave, in addition to offshore oil or gas exploration and development, should be prohibited in the coastal zone.**

10) **There are no over-arching guidelines limiting urban or commercial service area boundaries. Zoning constraints to determine boundaries must be provided to avoid inappropriate use permits.**

11) **Preserve and enhance affordable housing opportunities on the Sonoma County coast by enforcing a moratorium on vacation rentals until such time that no more than 20% of housing is for vacation rental use.** (Santa Cruz LCP language, approved by the Coastal Commission).

12) **Regulate vacation rentals specifically:** One off-street parking spot per bedroom and 2 cars maximum per bedroom in vacation rental properties shall be required in residential areas to reduce traffic congestion and GHG (Trinidad LCP), unless neighborhood covenant rules have stricter parking rules in which case those parking regulations apply; a sign of not more than 3 by 3 feet shall be required on vacation units with phone number and contact information for complaints (Santa Cruz LCP); to support climate change impacts associated with tourism and affordability for residents/workforce, minimum rental shall be for 7 days. (Solano Beach has 7 days, Imperial County has a 30 day minimum for vacation rentals). All vacation rentals shall be licensed and regulations enforceable by means of fines (California Senate Bill 1049 allows cities to fine rental hosts up to \$5000 per violation.) Property owners/management that have repeated violations shall have their license revoked for not less than one year.

13) **Require that “affordable housing” be reserved and maintained at low cost for occupancy by commercial visitor service workers who heretofore have been required to commute long distances to work.**

The suggested Housing Opportunity Area south of old town Bodega Bay refers to land developed illegally by RJ Battaglia for expensive vacation rentals, not truly affordable housing. Further permits with for this individual’s project should be curtailed.

## Public Facilities and Services Comments

### Policy C-PF-2d:

-is incomplete and confusingly written:

“Master plans or equivalent documentation shall be prepared for all water and wastewater management systems prior to approval of facility expansion or improvement projects. *All facilities shall be designed and constructed in accordance with the existing and planned development in the applicable jurisdictions. In the event that a master plan or monitoring fails to show adequate facilities or supplies for existing development, zoning changes, building permits, or other entitlements in order to protect services to existing residents.*”.....?

### page 7, Policy C-PF-2g:

“Public park and recreational facilities” are not defined. There is concern that private landowners could access public services for privately-developed recreational concessions open to the public. Terms should be clearly defined here or in the Glossary to avoid that possibility,

### page 9, Policy C-PF-2p: *for example:*

-Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development in accordance with California Coastal Act Sections 30222 and 30254. *The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority consistent with coastal priority land uses of the Coastal Act. (NEW)*

### pages 9 and 10:

-Further Park and Recreation Facility Development are being encouraged and planned. Anticipated tourism and recreational growth puts the cart before the horse. These goals, objectives and policies are in support of a mistaken premise—that the Sonoma County Coastal Zone has an unlimited capacity for recreational development. It does not. Its unique

qualities are already being degraded by recreation and tourism in excess of its public safety, transportation, facilities and services carrying capacity. Rather than increasing development to meet population growth and demand, it is time to safely steward coastal resources and more carefully manage the amount of recreational use we already have (eg, many pounds of garbage and even human feces were left on Doran Beach in the aftermath of the 2018 4th of July fireworks event, per Patty Ginocchio).

page 15: **Policy C-PF-5d:**

- Inadequate fire and emergency services in the coastal zone are still not clearly addressed: “Support actions, including consolidation of fire districts and increased tax revenue that will provide sustainable fire protection and emergency medical services. Identify funding opportunities that will require visitor serving uses to provide support.”
- Sonoma County Coastal zone tourism generates more TOTs than any other region in the County but the revenue is not returned commensurate with the need for basic public safety services.

page 18, **Policy C-PF-7:**

- Application of biosolids policy must include US EPA listed criteria, eg: “Sufficient land to provide areas of non-application (buffers) around surface water bodies, wells, and wetlands; Depth from the soil surface to groundwater equal to at least one meter; Soil pH in the range of 5.5 to 7.5 to minimize metal leaching and maximize crop growing conditions;” etc.

No solid waste facility should be visible or smelled in the Coastal Zone.

page 19, **Policy C-PF-2a, p 19:**

- To close potential loopholes for leap-frogging new development, as in: “Development, including land divisions, shall be prohibited unless adequate water and wastewater treatment and disposal capacities and facilities exist to accommodate such development.”, we recommend inserting the words “*on-site*” between “unless” and “adequate”.
- And to prevent a proliferation of Outside Service Agreements, we further recommend adding language that “OSAs should be the last option and only if all other options for onsite disposal allowed by Public Health and the Basin plan are not feasible.”

page 24, **Other Initiative C-PF-1:**

-The pervasive water shortage in the coastal zone should be noted and integrated into policy regarding any future development. The most recent Municipal Service review of the Bodega Bay District by LAFCO was in 2004: "Updated policy for water needs of any new development should be based on most current data and science and the impact on existing water resources and facilities." .....and should include this language:  
"Utilize CDWR and County Water Board guidance in formulating any aquifer estimates and long-term sustainability of local water supplies."

COMMENT 104

Element	Section	Section Page	Comment Page	Comment Section	COMMENT	Change To
<b>Circulation &amp; Transit</b>						
1. Introduction	1.1 Purpose & Background	1				
			1	1.1	2nd paragraph	The current traffic congestion [on] ALONG the coast has resulted from a combination of factors. Regional factors include growth in employment and population [primarily within Sonoma County's cities]. Local factors include increases in parkland ATTRACTIONS [acreage through expansions, acquisitions, and dedications]; in the number and length of trails and associated hiking opportunities; in access to the beach and ocean; and lack of public transportation. [Most importantly,] The public HAS FEW ALTERNATIVES TO [continues to prefer] the automobile as the primary means of transportation.
	1.2 Relationship to Other Elements	1				
	1.3 Scope & Organization					
2. Circulation & Transit System	2.1 Existing & Projected Transportation Systems in 2020	2				
		2	3	2.1.1	3rd para	Sonoma Coast State Park and Sonoma County public beaches are among the most visited parks northwestern California, generating significant weekend traffic congestion. With limited public transportation and lack of safe bicycle routes, most people HAVE BEEN [are] obligated to drive in order to enjoy the Sonoma Coast.
			3	2.1.1	In "Roadway Capacity and Conditions" Last sentence	DUE TO THE [With] narrow shoulders, LIMITED [inadequate] sight lines, and limited opportunity for safe passing, improving THE ADHERENCE TO SAFE SPEED LIMITS [road safety] is the primary concern along the entire length of Highway 1.

			4		in "Transportation Improvements" 1st para	MORE THAN THREE DECADES HAVE PASSED SINCE THE [In the 1985] California Department of Transportation (Caltrans) Route Concept Report Summary on State Highway 1, RECOMMENDED ROADWAY IMPROVEMENTS, BUT ONLY A FEW HAVE BEEN FUNDED AND BUILT. [Caltrans identifies the following potential roadway safety improvement projects: shoulder widening, passing lanes, channelization and intersection improvements to enhance turning movements, additional parking areas where unsafe parking conditions currently exist, and features that would minimize roadside parking on the highway. Safety improvements to State Highway 1 constructed since the last Local Coastal Plan Update in 1995 include left turn lanes at The Sea Ranch, at the intersection with State Highway 116 near Jenner, near The Tides restaurant, and at the Bodega Harbour Subdivision. Other improvements include stabilization projects north of Jenner, guardrails along the Russian River estuary, and the ongoing project to relocate Highway 1 along Gleason Beach.] IT IS UNCERTAIN THAT THIS SCENIC ROUTE WILL BE A HIGH PRIORITY FOR MANY ADDITIONAL PROJECTS.
						SHOULD FUNDING BECOME AVAILABLE, providing turning lanes at intersections and parking areas is the most effective approach to improving the SAFETY [capacity] of State Highway 1 while maintaining it as a two lane scenic highway. Addition of turning lanes provides considerable safety benefits as well as reducing traffic delays in Jenner, Bodega Bay, and near public beaches.
						Minor road improvements in the community of Bodega Bay will not relieve traffic congestion, and establishing a bypass route has proven infeasible. While capacity along this section of State Highway 1 will remain LIMITED, [inadequate,] there are MANY opportunities to improve [pedestrian] safety and reduce dependency on automobiles for [local] trips OF LESS THAN 3 MILES by adding pedestrian walkways, INTRODUCING SHARED ELECTRIC BICYCLE OPPORTUNITIES, restricting turning movements across traffic, and reducing vehicle speeds.
			4		2nd para	Reducing speed limits is the most practical way to <del>SHOULD FUNDING BECOME AVAILABLE, providing turning lanes at intersections and parking areas is the most effective approach</del> improve the SAFETY <del>capacity</del> of State Highway 1 while maintaining it as a two lane scenic highway. <del>Addition of turning lanes might provides considerable safety benefits as well as reducing traffic delays in Jenner, Bodega Bay, and near public beaches.</del>



			4		3rd para	Other safety improvements THAT HAVE BEEN proposed for State Highway 1 are SIGNAGE TO ALERT MOTORISTS TO PEDESTRIANS AND CYCLISTS, selective widening and road alignments; parking management, development and enforcement programs; [and other types of road improvements such as] roadway striping and marking, bicycle lanes and pedestrian ways. Improvements to State Highway 1 such as construction of bicycle paths or widening of shoulders will be necessary to construct the Sonoma County segment of the California Coastal Trail (see discussion below).
			4		5th para	Minor road improvements in the community of Bodega Bay will not relieve traffic congestion, and establishing a bypass route has proven infeasible. While capacity along this section of State Highway 1 will remain LIMITED, [ <del>inadequate</del> ], there are MANY opportunities to improve [ <del>pedestrian</del> ] safety and reduce dependency on automobiles for [ <del>local</del> ] trips OF LESS THAN 3 MILES by adding pedestrian walkways, INTRODUCING SHARED ELECTRIC BICYCLE OPPORTUNITIES, <del>restricting turning movements across traffic</del> , and reducing vehicle speeds. AT PRESENT, MINIMAL public transit is provided by Mendocino Transit Authority and Sonoma County Transit. Mendocino Transit Authority operates bus route 95, which is the only year-round transit service along the Sonoma Coast. Service is CURRENTLY limited to a single daily trip running southbound to Santa Rosa in the morning and returning in the afternoon. This route provides a limited opportunity for coastal residents working in Sebastopol and Santa Rosa, but does not provide ADEQUATE [ <del>good</del> ] service for workers OR VISITORS. <del>living in the coastal area that need to commute to jobs in the inland areas of Sonoma County</del> ] PROCEEDS OF A PARKING <del>PASS</del> RESERVATION PROGRAM FOR VISITORS <del>SHOULD</del> MIGHT BE CONSIDERED AS A MEANS OF REDUCING CONGESTION <del>AND</del> BY HELPING TO FUND <del>FUNDING</del> ADEQUATE PUBLIC TRANSPORTATION.
			5	2.1.2	In "Active Transportation and Transit"	
3. Circulation & Transit System Policy	3.1 General Transportation Policies	6		GOAL C-CT-1	<i>It is critical to reduce dependence on automobiles, both to maintain the scenic qualities of Highway 1, and to improve safety for cyclists and pedestrians.</i>	

				Objective C-CT-1.1	<p><i>It would be better to state that: "The most likely way to initiate basic funding for much-needed public transit and shuttle services would be to establish an equitable public and private parking reservation system for the vicinity of Jenner, taking lessons from the parking reservation system and private and public shuttles that now serve Muir Woods. <a href="https://MarinTransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf">https://MarinTransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf</a> Such a system could be developed for destination parking areas that fill up most quickly on high-visitor days. An experienced public or private entity with a diverse advisory board representing public and private entities that own parking spaces, as well as visitors, residents, and employees of coastal entities, could administer such a system.</i></p>	<p>"Because the cost of needed improvements to the circulation and transit system are likely to range from \$10 million to \$30 million per year, launch projects that will increasingly attract Federal and State grants to supplement local fees, taxes, and bonds."</p>
					<p><i>It would be better to state that: "The most likely way to initiate basic funding for much-needed public transit and shuttle services would be to establish an equitable public and private parking reservation system for the vicinity of Jenner, taking lessons from the parking reservation system and private and public shuttles that now serve Muir Woods. <a href="https://marintransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf">https://marintransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf</a> Such a system could be developed for destination parking areas that fill up most quickly on high-visitor days. An experienced public or private entity with a diverse advisory board representing public and private entities that own parking spaces, as well as visitors, residents, and employees of coastal entities, could administer such a system.</i></p>	<p><i>It would be better to state that: "The most likely way to initiate basic funding for much-needed public transit and shuttle services would be to establish an equitable public and private parking reservation system for the vicinity of Jenner, taking lessons from the parking reservation system and private and public shuttles that now serve Muir Woods. <a href="https://marintransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf">https://marintransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf</a> Such a system could be developed for destination parking areas that fill up most quickly on high-visitor days. An experienced public or private entity with a diverse advisory board representing public and private entities that own parking spaces, as well as visitors, residents, and employees of coastal entities, could administer such a system.</i></p>
				Objective C-CT-1.2	<p>There are limits to expansion of the road network and parking areas can not reasonably be expanded to support rising numbers of automobiles visitors. Therefore, it is important to . . . . (see change)</p>	<p>Develop a convenient and reliable system of public and private buses, shuttles, TNC services, vans, bike-share services, and pathways that will make it practical and attractive for increasing numbers of visitors to park automobiles at inland locations.</p>
				Objective C-CT-1.3	<p><i>Because the Air Resources Board Staff has predicted that California's vehicle miles traveled must be reduced by 25% by — reductions at the rate of about 1% per year in vehicle miles traveled are most likely to be required for the Local Coastal Zone. The objective must be:</i></p>	<p>"Steadily reduce vehicle miles traveled as well as greenhouse gas emissions to comply with State and regional requirements."</p>

			<p>Objective C-CT-1.3 cont</p>	<p><i>Because the Governor's Office of Planning and Research has recognized that California's vehicle miles traveled per capita must be reduced, declines at the rate of about 1% per year are likely to be required for the County and the Local Coastal Zone should assume a similar requirement. Calif. Office of Planning &amp; Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, Dec. 2018, p.2: . . . to achieve the State's long-term climate goals, California needs to reduce per capita VMT. This can occur under CEQA through VMT mitigation. Half of California's GHG emissions come from the transportation sector 3, therefore, reducing VMT is an effective climate strategy, which can also result in co-benefits. 4 Furthermore, without early VMT mitigation, the state may follow a path that meets GHG targets in the early years, but finds itself poorly positioned to meet more stringent targets later. For example, in absence of VMT analysis and mitigation in CEQA, lead agencies might rely upon verifiable offsets for GHG mitigation, ignoring the longer-term climate change impacts resulting from land use development and infrastructure investment decisions. As stated in CARB's 2017 Scoping Plan: <a href="https://www.opr.ca.gov/docs/20190122-73_Technical_Advisory.pdf">https://www.opr.ca.gov/docs/20190122-73_Technical_Advisory.pdf</a></i></p>	<p>SB 375 and the Air Resources Board call for California's vehicle miles traveled to <del>per capita must</del> be reduced, <del>by about 25%</del> at the rate of about 1% to 3% per year in order to achieve carbon neutrality by the year 2050. Plans for <del>are likely to be required for the County and the Local Coastal Zone will should assume a similar requirement</del> be consistent with this trend.</p>
			<p>Objective C-CT-1.5</p>	<p><i>Since automobile travel is sensitive to pricing and the attractiveness of alternatives such as cycling and walking, the emphasis should be to:</i></p>	<p>"Reduce the use of automobiles by the workforce through a jobs/housing balance of approximately 1.5 jobs within walking and cycling distance of each year-round residence, and by assuring access to a safe network of bicycle-pedestrian pathways."</p>
<p>6 &amp; 7</p>			<p>Objective C-CT-1.6</p>	<p><i>Within the Coastal area, the objective should be to</i></p>	<p>"Encourage projects that are designed to encourage active transportation, such as the use of pathways, bicycles, vans and shuttles."</p>
<p>7</p>			<p>Policy C-CT-1b</p>	<p><i>Because the best way to reduce driving is to make drivers aware of the costs, this policy should be to:</i></p>	<p>Require all new developments and all significant improvements to existing developments to unbundle parking costs so that users who bicycle, walk, or use transit are not required to pay for parking.</p>
<p>3.2 Public Transit &amp; Motor Vehicle Trip Reduction (GP2020)</p>	<p>7</p>		<p>Goal C-CT-2</p>	<p><i>Because State law as well as regional policies require vehicle miles traveled to be steadily reduced, this goal should state:</i></p>	<p>"Decrease vehicle miles traveled by approximately 1% per year, and provide for increasingly attractive alternative means of travel to and within the Coastal Zone."</p>
			<p>Objective C-CT-2.6</p>	<p>Where is C-CT-2.6?</p>	
			<p>Objective C-CT-2.10</p>	<p><i>Because some roads are currently unsafe for cyclists and pedestrians at present, this objective should read:</i></p>	<p>Assure that all roads have speed limits consistent with safe use by cyclists, pedestrians and drivers, considering the design and condition of existing shoulders, paths, roadways, and bike lanes.</p>
<p>8</p>			<p>Policy C-CT-2c</p>	<p><i>It would more clear to say:</i></p>	<p>On transit routes, provide turnouts for bus operations.</p>

			Pages 9 - 16	Policy C-CT-2d	THE BICYCLE COALITION SHOULD LOOK AT THE BIKEPED SECTIONS. The national highway entities that are auto-oriented have specifications for bicycle elements of road projects that are not optimal (or safe) for bicycles. IN BICYCLE & PEDESTRIAN FACILITIES, <b>INCLUDE DEFINITION OF CLASS IV BIKEWAYS</b>	[Wherever feasible.] Require development projects to UNBUNDLE THE COST OF PARKING, AND WHEREVER FEASIBLE TO implement measures that increase the average occupancy of vehicles, such as: (GP2020 Revised) <b>INCLUDE DEFINITION OF CLASS IV BIKEWAYS</b>
3.3 Road Capacity	16	12	17	Policy C-CT-3j Objective C-CT-4.1  Policy C-CT-4e  Policy C-CT-4e (2) Policy C-CT-4e (3) Policy C-CT-4e (4)	this could create some problems	REDUCE VEHICLE MILES TRAVELED IN ORDER TO Maintain an LOS C or better on roadway segments unless a lower LOS has been adopted.  IMPLEMENT MEASURES TO REDUCE VEHICLE MILES TRAVELED ON [ <del>Designate and design</del> ] Rural Principal and Minor Arterial Roads [as highway routes] that carry large volumes of intercity traffic [and that place priority on the flow of traffic rather than on access to property. The following policies apply to Urban and Rural Arterials]: DELETE
				Policy C-CT-4e (3)		DELETE
				Policy C-CT-4e (4)		DELETE
		18		Policy C-CT-4j  Policy C-CT-4k  Policy C-CT-4m  Policy C-CT-4n		AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, consider intersection management improvements at key intersections throughout the coast as needed to address intersection congestion and long delays for turning movements. These may include installation of traffic signals, signal timing, re-striping, lengthening, turn lane additions, or other improvements, provided the improvements are consistent with the applicable road classifications and protection of coastal resources. (GP2020/Existing LCP)  Construct improvements such as realignment, signalization, roundabouts, turn restrictions, [ <del>one-way streets,</del> ] and traffic calming at the following intersections to improve safety at the following intersections: (GP2020/Existing LCP revised)  AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, Consider constructing the following sets of road improvements to increase the capacity and safety of State Highway 1 in Jenner:  AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, Consider providing turn lanes at The Sea Ranch intersections listed below. An intersection improvement of lower priority could be constructed before an intersection improvement of higher priority if funding is available.

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			20	Policy C-CT-4q		AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, consider Implementing the following [capacity and] safety improvements along State Route 1:
				Policy C-CT-4s		While providing for REDUCTIONS IN VEHICLE MILES TRAVELED <del>[capacity]</del> and safety improvements, ensure that State Route 1 shall remain a scenic two-lane highway within rural areas. (New)
	3.4 Phasing & Funding of Improvements Policy		21	Goal C-CT-5		Integrate the funding and development of planned circulation and transit system improvements with county wide transportation planning efforts, REDUCTIONS IN VEHICLE MILES TRAVELED, and land use planning and development approval. (GP2020)
				Objective C-CT-5.3		Maintain acceptable Levels of Service as set forth in this Element by REDUCING VEHICLE MILES TRAVELED <del>[implementing funding strategies for planned improvements]</del> .
				Policy C-CT-5a		Review and condition development projects to assure that the REDUCTIONS IN VEHICLE MILES TRAVELED [LOS] and/or public safety objectives established in Policies C-CT-4a and C-CT-4b are being met. If the proposed project would result in INCREASED VEHICLE MILES TRAVELED <del>[an LOS worse than these objectives]</del> , consider denial of the project. <del>[unless one or more of the following circumstances exist:</del>
				Policy C-CT-5a (1)		DELETE
				Policy C-CT-5a (2)		DELETE
				Policy C-CT-5a (3)		DELETE
				Policy C-CT-5b		Require that new development REDUCE VEHICLE MILES TRAVELED, AND <del>[provide project area improvements necessary to]</del> accommodate vehicle and transit movement in the vicinity of the project, including <del>[capacity improvements]</del> traffic calming, right-of-way acquisition, access to the applicable roadway, safety improvements, and other mitigation measures necessary to accommodate the development without inhibiting public access. (GP2020 Revised)
4. Implementation Programs	4.1 Circulation & Transportation Implementation Programs		22	Program C-CT-1 (2)		Assesses REDUCTIONS IN VEHICLE MILES TRAVELED <del>[the level of service (LOS)]</del> and how well planned improvements are IMPROVING ACTIVE TRANSPORTATION OPTIONS TO KEEP <del>[keeping]</del> pace with County wide growth and development
				Program C-CT-1 (6)	Change last para	Is capable of modeling weekend and off-peak travel demand in order to MINIMIZE VEHICLE MILES TRAVELED DUE TO <del>[plan for]</del> tourism and special events <del>[traffic]</del> . Consider the use of moratoria or other growth management measures in areas where the monitoring program shows that the LOS objectives are not being met due to POTENTIAL INCREASES IN VEHICLE MILES TRAVELED <del>[lack of improvements]</del> . (GP2020)

				Program C-CT-2		<p>Monitor traffic volumes on County-maintained road segments, and ADJUST PARKING PERMIT CHARGES TO PREVENT <del>[work with @trans on similar State Highway 1 segments that are projected to experience]</del> unacceptable Levels of Service during peak weekend periods, particularly in the summer and fall months. Assemble these data for use in future assessment of THE PARKING PERMIT SYSTEM TO IMPROVE <del>[development project impacts on]</del> weekend traffic patterns. (GP2020)</p>
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**From:** [Chelsea Holup](#)  
**To:** [Gary Helfrich](#)  
**Subject:** FW: Share the Sea Ranch  
**Date:** Monday, July 19, 2021 8:34:10 AM

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**From:** Tamir Scheinok <tscheinok@gmail.com>  
**Sent:** July 16, 2021 5:56 PM  
**To:** Scott Orr <Scott.Orr@sonoma-county.org>; Scott Hunsperger <Scott.Hunsperger@sonoma-county.org>; Chelsea Holup <Chelsea.Holup@sonoma-county.org>; PRMD-LCP-Update <PRMD-LCP-Update@sonoma-county.org>  
**Cc:** Mimi Choi <lilmouse.choi@gmail.com>  
**Subject:** Share the Sea Ranch

Greetings, I am a homeowner at The Sea Ranch.

We support the introduction of reasonable performance standards, dictating how Short Term Rentals are operated responsibly, as proposed in the revised Sonoma County Local Coastal Plan (LCP, Program C-LU-1).

The TSRA Board has authorized its Short Term Task Force to lobby the county for the proposed Model Rule 6.7 ([here](#), page 4a8), including these restrictions, on its behalf. The Model Rule has not been sent out for member comment and is opposed by many members. It is not based on credible studies or facts and is very damaging to owners who rent their home on a short-term basis.

We strongly oppose restrictions on whether and when owners may rent their properties as proposed by The Sea Ranch Association (TSRA) Board in their "Model Rule 6.7" ([here](#), page 4a8). These restrictions include limits on the number of days a home can be rented, a reduction in the total number of rental homes and a minimum of 300ft between any two rental properties.

We urge the Sonoma County Planning Commission and Board of Supervisors to reject the proposed Rule and not to delegate the creation of performance standards and / or restrictions to the TSRA Board.

Sincerely, Tamir

--

Tamir Scheinok  
41557 Hatchway Ct  
The Sea Ranch

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## COMMENT 106

**From:** [Bryany Burke](#)  
**To:** [PRMD-LCP-Update](#)  
**Cc:** [Andrew Mann](#)  
**Subject:** Question for Oct 7 LCP Hearing  
**Date:** October 05, 2021 9:29:35 AM

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### EXTERNAL

Hello,

I'd like to submit a question for the upcoming hearing about the new LCP on October 7<sup>th</sup>.

I'm working on a residential project for a client at The Sea Ranch. In the past, review of habitat areas at the Sea Ranch has been under the purview of The Sea Ranch Association. As the new LCP and ESHA maps become relevant over lots at The Sea Ranch, we are finding that properties which were created for residences in earlier subdivisions are becoming largely unbuildable for neighborhood-appropriate residences under the changing standards at PRMD. What can be done for these affected properties so that the owners are not left with lots that cannot be developed for reasonable residential use?

Thank you,

**Bryany Burke**

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City Council

Mayor Una Glass

Vice Mayor Sarah Gurney

Patrick Slayter

Neysa Hinton

Diana Rich



September 21, 2021

Sonoma County Planning Commission

Attn: Gary Helfrich

2550 Ventura Avenue

Santa Rosa, CA 95403

Re: DRAFT Sonoma County Local Coastal Plan

The City of Sebastopol is the gateway to coastal Sonoma County, and the policies and future plans contained in the draft Local Coastal Program(LCP) affect Sebastopol more than other Cities in the County as outlined below. Additionally, City officials have been contacted with concerns regarding the Plan, as noted below. We feel these concerns that need to be further analyzed and addressed in the plan.

These include:

- Growth, population density, public events and intense tourism in coastal areas impact traffic in Sebastopol since a significant amount of coastal traffic must go through Sebastopol (Bodega Highway) to access the coast. This is evidenced by the 117% increase in traffic on Bodega Highway between 2007-2017 as noted in the Plan (Table C-CT-1).
- Short term rentals (Air B&B, VRBO, etc.) in the coastal zone impact the availability of housing, housing affordability, and traffic, regionally.
- The State of California has adopted several laws related to reducing vehicle miles traveled and reducing greenhouse gas emissions. However, these do not appear to be adequately addressed in the Plan.
- Intensification of land uses in the coastal zone, including large scale tourism and wineries, where water resources are known to be scarce, will affect the quantity of water available at the coast. This may impact demand for water sales by the City of Sebastopol to potable water haulers.
- A significant percentage of emergency calls to the Bodega Bay Fire District are tourism related. Large events and intense tourism may impact Sebastopol's fire department as well with demands for service related to the City's reciprocal aid agreements.
- The coast is a recreational resource for residents of Sebastopol. Intense use at the coast will overburden narrow winding roads, increasing danger to residents when they go to enjoy coastal recreation, as well as burdening emergency health services.

Thank you for considering these impacts as you evaluate the current LCP draft document.

Sincerely,

A handwritten signature in black ink, appearing to read 'Una Glass', with a long horizontal flourish extending to the right.

Una Glass  
Mayor

Cc: Tennis Wick, Director, Permit Sonoma  
Supervisor Linda Hopkins, District 5  
Lawrence McLaughlin, Sebastopol City Manager  
Mary Gourley, Assistant City Manager/City Clerk  
Kari Svanstrom, Sebastopol Planning Director

**From:** [Denny Tibbetts](#)  
**To:** [Eric Koenigshofer](#); [PRMD-LCP-Update](#)  
**Cc:** [Gary Helfrich](#)  
**Subject:** K- 2 Access Point  
**Date:** Thursday, March 24, 2022 6:00:44 PM  
**Attachments:** [DOC068.PDF](#)

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EXTERNAL

Dear Commissioners,

You asked good important questions during the 3 March hearing on public access. Where do access points come from? How are they selected? After review of the published minutes, I would like to clarify and correct statements that were made.

On page 7 of the minutes, Gary Helfrich stated the Land Trust bought that land specifically for the purpose of a public access point. On data provided by the SCAPOSD about the acquisitions of the District through Jan 1999, the purchase of the initial 86.8 acres in 1997 was an Agricultural/Conservation easement transaction. The conservation designation was scenic landscape, critical habitat and riparian corridor. As of January 1999, it stated they may consider limited access. There was NO access component at the time of acquisition. Please see the attached Sonoma County District 5 acquisition document - starred property.

Gary Helfrich further stated on page 7 that SLT requested that this access point be on the map. For the record, SLT directly told its Estero neighbors, including me they were not responsible for the designation for the public trailhead/access point on the public access map and were as surprised as we were to see it there.

Thank you,

Denny Tibbetts  
Bodega Bay, CA.

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**From:** [Denny Tibbetts](#)  
**To:** [Eric Koenigshofer](#); [PRMD-LCP-Update](#)  
**Cc:** [Gary Helfrich](#)  
**Subject:** K-2 Access Point on LCP public access maps  
**Date:** Friday, March 25, 2022 11:15:39 AM

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## EXTERNAL

Dear Commissioners,

Here is some additional correspondence between Sonoma Land Trust and Estero neighbors to clarify and correct the published minutes from the 3 March hearing on public access. I hope it is helpful in dealing with this inaccurate public access point. Having accurate and current public access points published on maps is vital especially in light of the recent rescue March 12 by Henry 1 of a nine year old boy in a canoe and the two accompanying adults from land. There are many other occurrences of related situations. Thank you,

Denny Tibbetts  
Bodega Bay

Sent from my iPad

Begin forwarded message:

**From:** Bob Neale <[bob@sonomalandtrust.org](mailto:bob@sonomalandtrust.org)>  
**Date:** September 3, 2021 at 5:09:36 PM PDT  
**To:** [cindyeggen@me.com](mailto:cindyeggen@me.com), [eric@cety.us](mailto:eric@cety.us), [zuccononnie@gmail.com](mailto:zuccononnie@gmail.com),  
[tibbsx4@comcast.net](mailto:tibbsx4@comcast.net)  
**Subject:** Trailhead and LCP

Dear Estero Lane Neighbors,

I've done a little investigating into the issue of the Trailhead that the draft LCP has located on Sonoma Land Trust's Estero Americano Preserve. I'm not positive who suggested that location for a trailhead, but it was not Sonoma Land Trust. I have reviewed the LCP map that shows the Trailhead, and others along the Estero, and I have done some further investigation. It is my understanding that the County views this Trailhead and other points on Figure C-PA-1k as a general designation of desired public access points. It doesn't change any existing property rights. It also does not require that a trailhead be built here, nor indicate any permission to do so. No obligation or requirement appears to be created. Given that the LCP is a broad County planning document and incorporates a process for broad community input, whether for or against any parts of the plan, Sonoma Land Trust doesn't think it is necessary for us to ask the County to remove this point from the map. It isn't clear that there is a mechanism to do this anyway.

As we discussed, Sonoma Land Trust has no current plans for developing a public access point or trailhead at that location. We are not in discussions with any County agency to develop a trailhead there. We understand and respect the private property rights of our neighbors and other landowners along Estero Lane as we do the County's process for updating the LCP. Any future support or opposition by SLT for the actual siting or construction of a trailhead on the Preserve will be dependent upon the actual plan and circumstances at that time, including the input of our neighbors. However, we are not aware of any current efforts for such a trailhead at this time.

Denny, thanks for bringing this issue to our attention, I wasn't aware of it. I look forward to talking to you all soon.

Best,

Bob

<image001.jpg>

**Bob Neale** *Stewardship Director*  
Sonoma Land Trust  
He/Him/His  
822 Fifth Street, Santa Rosa, CA 95404  
Cell (707) 391-3732  
[www.sonomalandtrust.org](http://www.sonomalandtrust.org)

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**From:** [ftbiglione@gmail.com](mailto:ftbiglione@gmail.com)  
**To:** [Gary Helfrich](#)  
**Cc:** [Susan Starbird](#); [John Dye](#); [Elizabeth Rowell](#); [kayakqueen@msn.com](mailto:kayakqueen@msn.com)  
**Subject:** Sonoma County's Local Coastal Program  
**Date:** Monday, April 18, 2022 3:39:29 PM

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**EXTERNAL**

Hi, Gary,

Thank you for your time spent to brief me on the Sonoma County Local Coastal Program and the importance of paddling community comments.

To recap, you are still collecting comments for the Final LCP document to be presented to the Board of Supervisors in May.

Interested paddlers concerned about continued access to the Estero Americano should send comments very soon. Your department prefers comments made by email because it simplifies your department's task of converting them to pdf's for the records and to comply with ADA accessibility standards.

Timing of these comments is best made prior to May 1<sup>st</sup>, to give your department sufficient time to incorporate them in your final LCP document. They should be addressed to yourself, [Gary.Helfrich@Sonoma-County.org](mailto:Gary.Helfrich@Sonoma-County.org), should be original, no form letters, and reflect your personal experiences and actions while paddling the Estero Americano.

As I understand it, you have received numerous comments related to the Estero Americano from ranchers, farmers, and the Farm Bureau thus far, but next to none from the paddling community.

Also, many of the comment letters claim environmental damage, litter, and trespass by paddlers on private lands, but, thus far, have not provide any documentation of Sherriff's reports, photos, or other evidence.

Best regards,

*Tom*

Tom Biglione  
PO Box 15466  
Sacramento, CA 95851

Cell 209-601-2724

COMMENT 2E

*“The health of our waters is the principal measure of how we live on the land.”*

~ Luna Leopold

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**From:** [John Dye](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano Access  
**Date:** Tuesday, April 19, 2022 3:46:33 PM  
**Attachments:** [2021\\_0430 Estero Americano Presentation Rev02.pdf](#)  
[People v Sweetser.pdf](#)

---

## EXTERNAL

Dear Mr. Helfrich,

I'm writing to comment on the Estero Americano. The Estero is a Navigable waterway which has long supported on water recreation in the form of Fishing, Hunting and Paddle Sports. I've been paddling on the Estero since 1993. Fellow canoers and kayakers from Marin, Sonoma, San Francisco and as far away Sacramento, Tahoe, Reno and beyond have enjoyed the area since at least the early 1980's. it is a valuable resource for California tax payers and registered voters.

I've spent considerable time convincing local land owners, first responders and Marin county public servants of the public ownership of the access point at Marsh Road just south of Valley Ford. Some neighboring land owner(s) have more than once blocked the public road with vehicles, logs and even built barricades across it, denying public, law enforcement and first responder access. See attached documentation which includes a survey, copy of the Certified Deed of Purchase by Co of Marin in 1961, and photos of some but not all attempts to deny access.

I've also listened to land owners' concerns about private property. In response to that I and Bay Area Sea Kayakers and Petaluma Paddlers organizations have been educating their membership on responsible use of the Estero since 2008:

- Leave no Trace
- The waterway is public
- Surrounding lands are private.
- No Trespassing
- No Camping
- No Fires
- Pick up after yourself
- Park to the side of the roadway. Leave access for Sonoma and Marin Fire should it be needed

I've encouraged Marin DPW to place a road sign at the intersection identifying the road as a public road and public access to the Estero. To date I have been unsuccessful. I encourage you to do your best to protect and recognize the Public's right to access our public waters, including the Estero Americano.

Sincerely,



John Dye

cell: 415.299.0827

[john@riversforchange.org](mailto:john@riversforchange.org)

COMMENT 5E

Attachments:

Estero Presentation Rev02

People vs Sweetzer court case, Fifth District Court of Appeals, 1977 for reference.

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# Exhibit A



← Estero Americano

Sonoma County

Marin County

Pacific Ocean

# Exhibit B



E  
P  
S



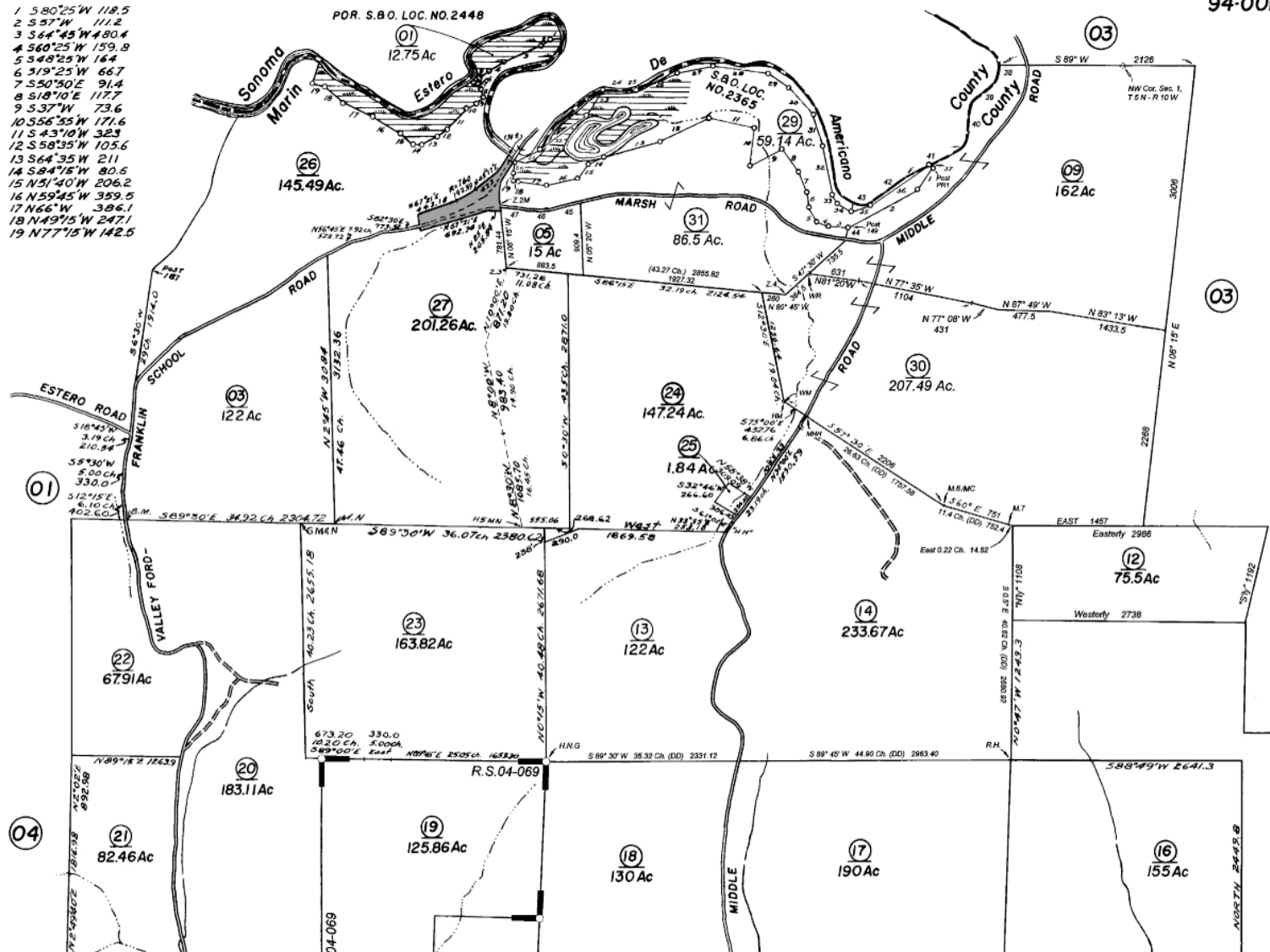
# Exhibit D

## POR. BLUCHER RANCHO

Tax Area Code  
94-001

- S & O Location No. 2365
- 1 S 43° W 330
  - 2 S 59° 30' W 489
  - 3 N 86° 30' W 211.2
  - 4 N 69° W 132
  - 5 N 29° 30' W 184.8
  - 6 N 9° 30' W 165
  - 7 N 26° W 264
  - 8 N 37° W 323.4
  - 9 S 58° 45' W 429
  - 10 N 10° 45' E 448.4
  - 11 N 80° 30' W 52.8
  - 12 S 61° 30' W 613.8
  - 13 S 72° W 660
  - 14 S 45° 30' W 198
  - 15 S 30° 30' W 211.2
  - 16 S 77° 30' W 349.2
  - 17 N 83° W 376.2
  - 18 W 24.42
  - 19 N 5° 30' W 67.32
  - 20 N 1° E 184.4
  - 21 N 67° 30' E 303.6
  - 22 N 50° 30' E 660
  - 23 N 30° 30' E 330
  - 24 S 86° E 297
  - 25 N 73° 30' E 72.6
  - 26 N 61° 15' E 541.2
  - 27 N 75° 75' E 415.8
  - 28 S 86° 30' E 627
  - 29 S 61° E 290.4
  - 30 S 45° E 409.2
  - 31 S 23° E 382.4
  - 32 S 13° 45' E
  - 33 S 34° 30' E 138.6
  - 34 S 62° E 165
  - 35 N 67° E 224.4
  - 36 N 52° 30' E 792
  - 37 S 45° E 39.6
  - 38 S 06° 13' W 218.6
  - 39 S 45° 39' W 352.4
  - 40 S 12° 13' W 575.4
  - 41 S 63° 05' W 297.5
  - 42 S 58° 00' W 955
  - 43 S 85° 16' W 200.4
  - 44 S 05° 15' W 66
  - 45 S 74° 50' W 159.0
  - 46 S 62° 30' W 196.4
  - 47 N 85° 18' W 534.5

- 1 S 80° 25' W 118.5
- 2 S 37° W 111.2
- 3 S 64° 45' W 480.4
- 4 S 60° 25' W 159.8
- 5 S 48° 25' W 164
- 6 S 19° 25' W 66.7
- 7 S 50° 30' E 91.4
- 8 S 18° 10' E 117.7
- 9 S 37° W 73.6
- 10 S 55° 35' W 171.6
- 11 S 43° 10' W 32.8
- 12 S 58° 35' W 105.6
- 13 S 64° 35' W 211
- 14 S 84° 15' W 80.5
- 15 N 51° 40' W 206.2
- 16 N 59° 45' W 359.5
- 17 N 66° W 386.1
- 18 N 49° 15' W 247.1
- 19 N 77° 15' W 142.5



8/21/2014 MEM

CHANGE		
BLK	PRIOR APN	NEW APN
	020	SURVEYS
020	100-020-08	28 & 29
020	10 & 11	100-020-30
020	07 & 28	100-020-31

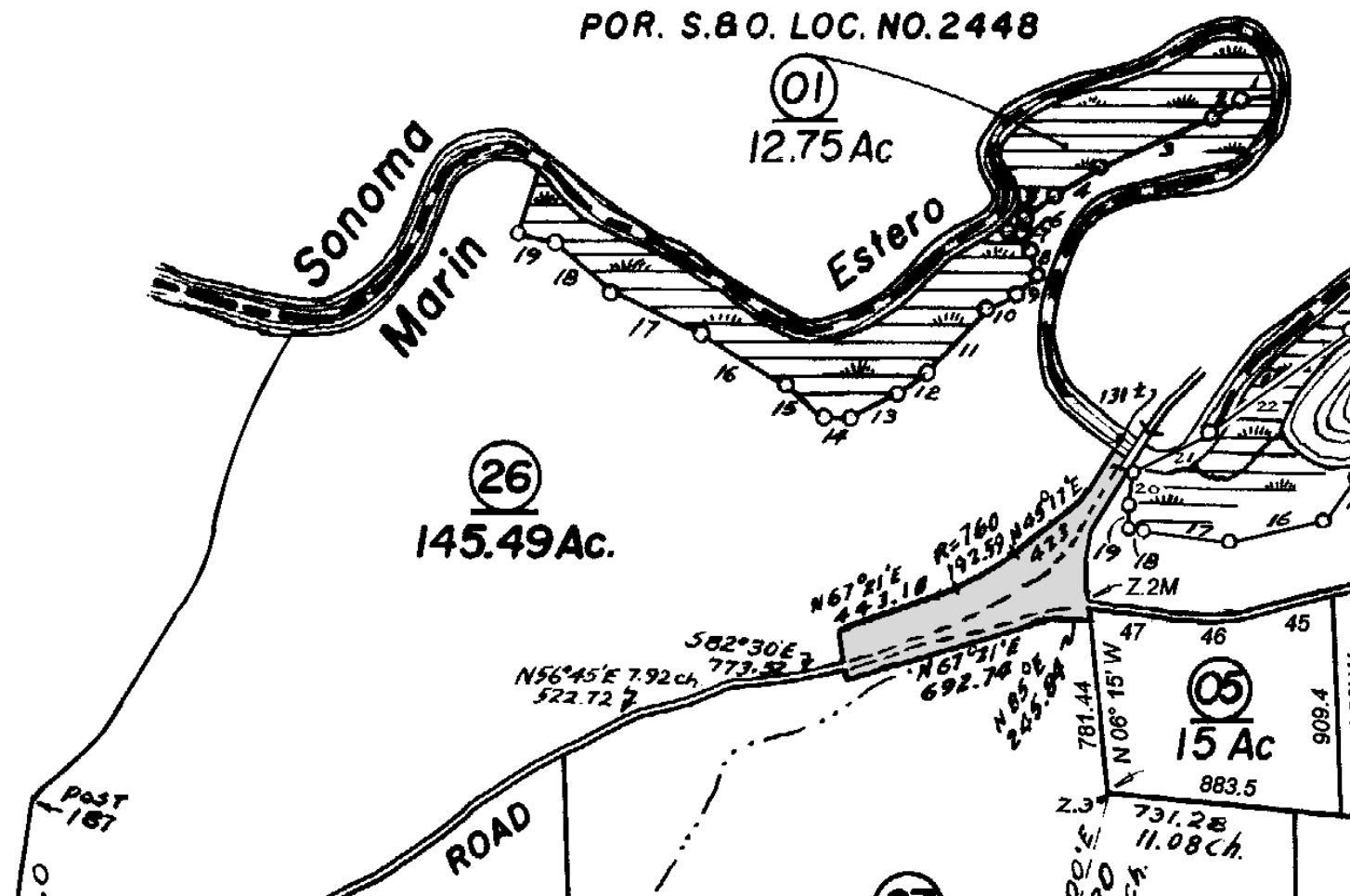
FOR ASSESSMENT PURPOSES ONLY. NO LIABILITY IS ASSUMED FOR THE ACCURACY OF THE DATA SHOWN. ASSESSORS PARCELS MAY NOT COMPLY WITH LOCAL SUBDIVISION OR BUILDING ORDINANCES.

# Exhibit E

COMMENT 5E

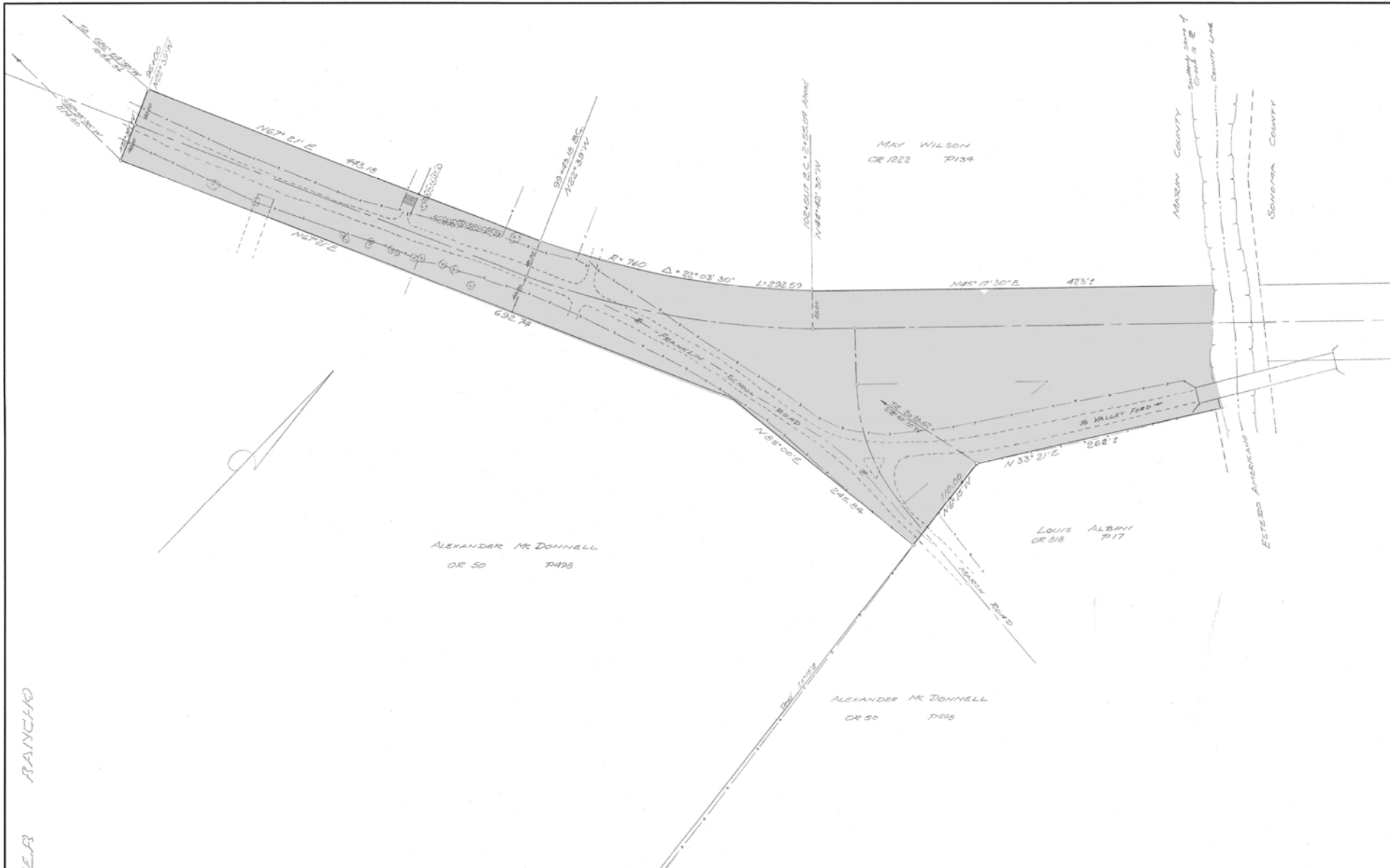
## POR. BLUCHER RANCHO

- 1 S 80°25'W 118.5
- 2 S 57°W 111.2
- 3 S 64°45'W 480.4
- 4 S 60°25'W 159.8
- 5 S 48°25'W 164
- 6 S 19°25'W 66.7
- 7 S 50°50'E 91.4
- 8 S 18°10'E 117.7
- 9 S 37°W 73.6
- 10 S 56°55'W 171.6
- 11 S 43°10'W 323
- 12 S 58°35'W 105.6
- 13 S 64°35'W 211
- 14 S 84°15'W 80.5
- 15 N 51°40'W 206.2
- 16 N 59°45'W 359.5
- 17 N 66°W 386.1
- 18 N 49°15'W 247.1
- 19 N 77°15'W 142.5



# Exhibit F

COMMENT 5E







# Exhibit H

Certified Grant Deed for Purchase of 2.66 Acres from May Wilson in 1961, Marin  
William D. Fusselman, Chairman of the Board of Supervisors.

1440 561

5831 GRANT DEED

MAY WILSON GRANTS to the COUNTY OF MARIN, a political sub-division of the State of California, for roadway purposes, all that real property in the County of Marin, State of California, described as follows:

That certain parcel of land situate in the Blucher Rancho described as follows:

Beginning at a point on the center line of the County road (known as the Valley Ford-Franklin School Road) as now fenced and travelled and running thence North 22°39' West 37 feet, more or less, to a point from which the intersection hereinafter designated as point "A" formed by said road centerline with the course in the easterly boundary line of that certain parcel of land described and designated Parcel One in the deed from George M. Wilson, et al, to May Wilson dated August 16, 1958, and recorded in Book 1222 at page 134, Marin County Official Records, and therein described as having a bearing of North 2-3/4° West and a length of 47.46 chains bears South 86°04'50" West 1086.54 feet distant; thence North 67°21'00" East 443.18 feet; thence on a curve to the left with a radius of 760 feet, through a central angle of 22°03'30", for an arc length of 292.59 feet; thence North 45°17'30" East 423 feet, more or less, to the southerly shoreline of the Estero Americano; thence easterly along said shoreline 131 feet, more or less; thence South 33°21'00" West 262 feet, more or less, to a point that bears North 78°40'20" East 2026.52 feet distant from said point "A" hereinabove mentioned; thence South 6°15' East 95 feet, more or less, to the center line of the County road commonly known as Marsh Road; thence southwesterly along the center lines of Marsh Road and said Valley Ford-Franklin School Road 94.5 feet, more or less, to the point of beginning.

Containing 2.66 acres, more or less.

DATED this 24 day of February, 1961.

Executed in the presence of:

Eraldo Zaso Witness  
May Wilson May Wilson

THIS IS CERTIFIED TO BE A TRUE COPY OF THE RECORDS OF THE MARIN COUNTY RECORDER DATE ISSUED

APR 18 2021  
BY William D. Fusselman DEPUTY

1440 561

STATE OF CALIFORNIA

County of Marin

On this 24 day of February in the year one thousand nine hundred and sixty-one before me

W. D. Fusselman County Clerk and for the County of Marin State of California, duly commissioned and sworn, personally appeared May Wilson

known to me to be the person whose name is subscribed to the within instrument as a witness, hereto, who, being by me duly sworn, deposed and said that he resides in the County of Marin State of California that he was present and saw May Wilson (personally known to him to be the person described in, and who executed the said within instrument as part of hereto), sign, seal, and deliver the same; that the said May Wilson duly acknowledged in the presence of said affiant that she executed the same and that the said affiant thereupon, and at the request of said grantor, subscribed his name as a witness hereto.

IN WITNESS WHEREOF I have hereunto set my hand and affixed my official seal in the County of Marin the day and year in this certificate first above written.

County Clerk: William D. Fusselman and for the County of Marin State of California.  
My Commission Expires \_\_\_\_\_

MA-251 - 5331 \$100.00000 A

# Exhibit I

Eucalyptus tree trunk positioned across Unmaintained County Roadway by party's



# Exhibit J

Eucalyptus Tree Trunk was removed, cut up and pushed aside by party's unknown 10<sup>th</sup>. Other party's unknown built a Log and Soil Berm / Barricade across the road 25<sup>th</sup>. Barbed wire fencing was added at some point. The Road and Estero remain including first responders for a couple weeks.



# Exhibit K

Public Recreation on the Estero Americano, A California Navigable Waterway





**Legend**

- County Maintained Roads
  - Arterial
  - Collector
  - Interstate
  - Local
  - Other Freeway
- Condominium Common Area
- Mobile Home Pad
- City
- Community
- Marin County Legal Boundary
- Other Bay Area County
- Ocean and Bay Address
- Parcel Secured

**Notes**

0.1                      0                      0.05                      0.1 Miles

NAD\_1983\_HARN\_StatePlane\_California\_III\_FIPS\_0403\_Feet  
© Latitude Geographics Group Ltd.

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.  
**THIS MAP IS NOT SURVEY ACCURATE**

COMMENT 5E

**H**THE PEOPLE, Plaintiff and Respondent,  
 v.  
 JOHN ALLEN SWEETSER, Defendant and Appel-  
 lant  
**Crim. No. 2978.**

Court of Appeal, Fifth District, California.  
 July 29, 1977.

#### SUMMARY

The municipal court found defendant guilty of misdemeanor trespass in violation of [Pen. Code, § 602](#), subd. (k)(1). The evidence indicated that the county possessed a 60-foot-wide easement for public highway purposes across a private ranch, that the easement included a 30-foot-wide bridge that crossed a navigable river which flowed through the ranch, that in the area where the highway approached the bridge the paved portion of the road narrowed to a width of 30 feet, leaving an unimproved 15-foot-wide strip of land on each side of the bridge, that the strips of land were fenced off and posted with no trespassing signs, that defendant had climbed the fence at the bridge in order to launch a kayak in the river, that a security guard for the ranch had seen defendant climb the fence and had asked him to leave since he was trespassing on private property, and that defendant refused to leave and began kayaking. (Municipal Court for the Bakersfield Judicial District of Kern County, No. 170665, Jack E. Lund, Judge.)

The Court of Appeal reversed. The court held that in light of the fact that the prosecution presented no evidence to show who had fenced the unimproved strip upon which defendant had been walking or, if the landowner had done so, whether he had obtained a permit from the county to do so, the prosecution failed to meet its burden of proof, under [Pen. Code, § 602](#), subd. (k)(1), that defendant had invaded the landowner's exclusive right of possession. The court further held that defendant was not committing a trespass while he was kayaking on the river, since the public has a right to use for boating, swimming, fishing, hunting and all other recreational purposes, any part of a river that can be navigated by small recreational or pleasure boats, even though the riverbed is privately owned. (Opinion by Gargano, J., with

Brown (G. A.), P. J., and Franson, J., concurring.)

#### HEADNOTES

Classified to California Digest of Official Reports

**(1)** Waters § 116--Determination and Use of Navigable Waters--Use--Hunting, Fishing, Boating and Swimming.

In California, the public has a right to use for boating, fishing, swimming and hunting and all other recreational purposes, any part of a river that can be navigated by small recreational or pleasure boats, even though the riverbed is privately owned. Thus, a boater who was kayaking on a river which passed through private ranchland was not committing a trespass while kayaking, where the evidence indicated that for the purposes of boating and kayaking, the river in that area could be "boated" the year round.

**(2)** Waters § 112--Determination and Use of Navigable Waters--What Waters Are Deemed Navigable--Determination.

Members of the public have the right to navigate and to exercise the incidents of navigation in a lawful manner at any point below high water mark on waters of the state which are capable of being navigated by oar or motor-propelled small craft.

**(3)** Easements and Licenses in Real Property § 7--Easements--Mode and Extent of Use--Public Highway.

An easement for public highway purposes includes every kind of travel for the movement or transportation of persons or property which is reasonable and proper in the use of a public way, or of a particular portion, and embraces all public travel on foot or in vehicles that is not prohibited by law or by a restriction in the easement itself. Additionally, while the mere granting of a public highway easement along the shore of a navigable river outside of a town or city does not necessarily carry with it a right of access to the river as an incident to the use of the highway, when the easement not only intersects the navigable river but crosses the riverbed and continues on over lands located on the other side, it grants access to the river as an incident to the use of the high-

72 Cal.App.3d 278  
 72 Cal.App.3d 278, 140 Cal.Rptr. 82, 7 Envtl. L. Rep. 20,653  
 (Cite as: 72 Cal.App.3d 278)

way, absent a showing of a contrary intent on the part of the grantor and the grantee. Thus, a member of the public was acting within the scope of a public highway easement across private land when he refused the landowner's request to leave and instead launched a kayak from within the confines of the easement into a river which passed through the landowner's property, where a bridge within the easement crossed the river, and where the individual was walking within the perimeters of the easement when asked to leave.

**(4)** Easements and Licenses in Real Property § 7--Easements--Mode and Extent of Use--Public Highways--Restriction of Use by County.

Although the members of the public have an inalienable right to use public highways in a reasonable manner without obstruction and interruption, this right is subject to the power of a county to impose reasonable regulations restricting the use of a county highway. For example, the public's right to use a county highway easement conveyed for public highway purposes does not arise until after the easement has been opened by the county for such purposes. Also, a county is not required to open or improve, for public travel, the full width of a county easement, and, on the contrary, a county is fully justified in refusing to do so where its purpose is to insure the safety of the traveling public. A county even has the statutory authority to issue a written encroachment permit allowing any person, including the underlying landowner, to place fences or other structures or objects upon portions of a county highway easement.

**(5a, 5b)** Trespass § 5--Acts Constituting Crimes--Misdemeanor Trespass-- Elements of Proof.

In a prosecution under [Pen. Code, § 602](#), subd. (k)(l), providing that any person who wilfully commits a trespass by entering any land enclosed by a fence without the written permission of the owner and who refuses to leave the land upon being requested to do so by the owner is guilty of a misdemeanor, of a person who climbed a fence which encroached on a public easement granted for highway purposes through private land to launch his kayak in a river over which the public highway passed, the prosecution failed to prove that defendant was committing a trespass against the landowner when the landowner's agent requested him to leave, where the prosecution presented no evidence to show who had fenced the unimproved strip of land within the easement upon which defendant had been walking when sighted, or,

if the landowner had done so, whether he had obtained permission from the county before building the fence.

[See [Cal.Jur.2d](#), Trespass, § 19; [Am.Jur.2d](#), Trespass, § 87.]

**(6)** Trespass § 5--Acts Constituting Crimes--Misdemeanor Trespass--Elements of Proof.

Under [Pen. Code, § 602](#), subd. (k)(l), providing that any person who wilfully commits a trespass by entering any land enclosed by a fence without the written permission of the owner and who refuses to leave the land upon being requested to do so by the owner is guilty of a misdemeanor, it is not sufficient merely to show that an accused wilfully entered upon fenced lands of another without written permission and then refused to leave the lands when requested to do so, but it is also incumbent to prove that the accused's presence on the land constituted a trespass in the sense that he invaded another's exclusive right of possession. Furthermore, a landowner who grants an easement to a governmental entity for public highway purposes possesses no right with respect to passage and travel on it that is greater than that of the general public, and accordingly, one who uses an easement conveyed for public highway purposes within the scope of the initial grant is not a trespasser against the landowner.

COUNSEL

Lillick, McHose & Charles, R. Frederic Fisher and Barbara H. Buggert for Defendant and Appellant.

Evelle J. Younger, Attorney General, N. Gregory Taylor and Jan Stevens, Assistant Attorneys General, as Amici Curiae on behalf of Defendant and Appellant.

Albert M. Leddy, District Attorney, and Stephen M. Tauzer, Deputy District Attorney, for Plaintiff and Respondent.

**GARGANO, J.**

This litigation, though labeled a criminal prosecution, is in reality a civil dispute between two private individuals. Appellant is a resident of Kern County with an avocation for the sport of kayaking. His antagonist is George Nickel, Jr., who owns the Rio Bravo Ranch in Kern \*282 County. The dispute centers upon appellant's right to use a small unimproved portion of a county highway easement located within the Rio Bravo Ranch for ingress to and egress from the Kern River.



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 72 Cal.App.3d 278, 140 Cal.Rptr. 82, 7 Env'tl. L. Rep. 20,653  
 (Cite as: 72 Cal.App.3d 278)

The basic facts are undisputed.

In the year 1940, George Nickel's predecessor in interest to the Rio Bravo Ranch conveyed a 60-foot-wide strip of land to Kern County for use by the county as "an easement or right-of-way for public highway purposes." The easement traversed the Rio Bravo Ranch in a north-south direction and extended over and across the bed of the Kern River which ran westerly through the ranch for a distance of approximately five and one-half miles. Presently, the 60-foot-wide easement is a part of an improved county highway known as Rancheria Road, and this highway, in crossing through the Rio Bravo Ranch, passes over the Kern River by way of a bridge 30 feet wide; in the area where the highway approaches the bridge, the paved portion of the road narrows to a width of 30 feet, leaving an unimproved 15-foot-wide strip of land on each side of the bridge; these strips of land are fenced off from the traveled roadway and are posted with "no trespassing" signs.

On July 15, 1973, Robert Folsom, a security guard for the Rio Bravo Ranch, was driving on Rancheria Road when he saw appellant climb under the fence at the northeast corner of the bridge; appellant was carrying a kayak toward the river. The security guard had seen appellant kayaking in the river in that area a few days earlier and on that occasion had told him to leave. Folsom got out of his automobile, climbed down the embankment and caught up with appellant when appellant was a short distance away from the river. He reminded appellant that he was trespassing on private property and again asked him to leave. Appellant replied that his "rights" were being infringed upon, placed his boat in the river and commenced kayaking. Folsom climbed back up the embankment, returned to his vehicle and ultimately called the sheriff's office.

A short time later, Deputy Sheriff Edward Leavelle arrived at the scene. Appellant still was kayaking in the river below the bridge. The deputy asked appellant to come up to the road; appellant complied. Relying upon Folsom's statement that appellant refused to leave the area at Folsom's request, the deputy cited appellant for a criminal trespass. \*283

On July 16, 1973, a criminal complaint was filed in the Municipal Court for the Bakersfield Judicial District charging appellant with a violation of subdivi-

sion (k)(1) of [section 602 of the Penal Code](#).<sup>FN1</sup> Appellant entered a plea of not guilty to the charge, and, after a one-day court trial, was convicted of the offense. Appellant appealed to the Appellate Department of the Superior Court of Kern County, and the conviction was reversed. Thereafter, we transferred the cause to this court for review.

FN1 Under subdivision (k)(1) of [section 602 of the Penal Code](#), any person who willfully commits a trespass by entering any land enclosed by a fence without the written permission of the owner or his agent, or the person in lawful possession, and who refuses or fails to leave the land immediately upon being requested to do so by the owner or his agent, or the person in lawful possession, is guilty of a misdemeanor.

(1) Preliminarily, it is clear that appellant was not committing a trespass while he was kayaking on the Kern River near the vicinity of Rancheria Road. The uncontradicted evidence shows that, for the purposes of boating and kayaking, the river in that area could be "boated" the year round. In this state the public has a right to use for boating, swimming, fishing, hunting and all other recreational purposes, any part of a river that can be navigated by small recreational or pleasure boats, even though the river bed is privately owned. (*Hitchings v. Del Rio Woods Recreation & Park Dist.* (1976) 55 Cal.App.3d 560, 566-571 [ 127 Cal.Rptr. 830]; *People ex rel. Baker v. Mack* (1971) 19 Cal.App.3d 1040, 1044-1050 [ 97 Cal.Rptr. 448]; *Bohn v. Albertson* (1951) 107 Cal.App.2d 738, 742-757 [ 238 P.2d 128].) (2) As the court explained in *People ex rel. Baker v. Mack, supra*, 19 Cal.App.3d 1040, 1050: "The modern determinations of the California courts, as well as those of several of the states, as to the test of navigability can well be restated as follows: members of the public have the right to navigate and to exercise the incidents of navigation in a lawful manner at any point below high water mark on waters of this state which are capable of being navigated by oar or motor-propelled small craft."

We turn to the question as to whether appellant was trespassing upon George Nickel's land before he entered the Kern River with his kayak.

(3) In the present case, it is undisputed that appellant

was walking within the perimeters of a county easement conveyed for “public highway purposes” and was carrying his kayak to the river when Nickel's security guard asked him to leave the premises. Consequently, appellant was acting within the scope of the easement when he refused to leave and instead placed his boat into the river. An easement for public \*284 highway purposes includes “... every kind of travel ... for the movement or transportation of persons or property which is reasonable and proper in the use of a public way, or of a particular portion thereof, ...” and embraces all public travel on foot or in vehicles that is not prohibited by law or by a restriction in the easement itself. (39 Am.Jur.2d (1968) Highways, Streets, and Bridges, § 195, pp. 573-574.) In addition, while the mere granting of a public highway easement along the shore of a navigable river outside of a town or city does not necessarily carry with it a right of access to the river as an incident to the use of the highway ( *California etc. Co. v. Union etc. Co.* (1899) 126 Cal. 433, 438, 440 [ 58 P. 936]), where, as here, the easement not only intersects with the navigable river but crosses the river bed and continues on over lands located on the other side, it grants access to the river as an incident to the use of the highway, absent a showing of a contrary intent on the part of the grantor and the grantee. (See 39 Am.Jur.2d (1968) Highways, Streets, and Bridges, § 256, p. 644.)

(4) However, this does not end our inquiry, for we do not subscribe to the proposition that members of the public have the unrestricted right to use the entire width of a county easement conveyed for public highway purposes as appellant seems to maintain. Although the members of the public have an inalienable right to use public highways in a reasonable manner without obstruction and interruption, this right is subject to the power of a county to impose reasonable regulations restricting the use of a county highway. (Sts. & Hy. Code, § 942.5; *Acosta v. County of Los Angeles* (1961) 56 Cal.2d 208, 210 [ 14 Cal.Rptr. 433, 363 P.2d 473, 88 A.L.R.2d 1417]; see *Escobedo v. State of California* (1950) 35 Cal.2d 870, 875-876 [ 222 P.2d 1]; *Ex parte Daniels* (1920) 183 Cal. 636, 639 [ 192 P. 442, 21 A.L.R. 1172]; *Findley v. Justice Court* (1976) 62 Cal.App.3d 566, 572 [ 133 Cal.Rptr. 241].) For example, the public's right to use a county highway easement conveyed for public highway purposes does not arise until after the easement has been “opened” by the county for such purposes. (See 39 Am.Jur.2d (1968) Highways, Streets,

and Bridges, § 68, p. 455.) Also, a county is not required to open or improve, for public travel, the full width of a county easement; on the contrary, a county is fully justified in refusing to do so where its purpose is to insure the safety of the traveling public. (See *Sts. & Hy. Code, §§ 942.5*, subd. (a), 4001, 4090, 5005, 5101.) Finally, a county even has the statutory authority to issue a written encroachment permit allowing any person, including the underlying landowner, to place fences or other structures or objects upon portions of a county highway easement. (*Sts. & Hy. Code, §§ 1450*, subds. (a) and (b), 1460, subd. (b).) \*285

The case of *People v. Henderson* (1948) 85 Cal.App.2d 653 [ 194 P.2d 91], upon which appellant relies for the proposition that the public has the unrestricted right to use the entire width of a highway easement, is distinguishable. There, the defendant landowner, without having an encroachment permit (see *Sts. & Hy. Code, §§ 660, 670*), built a shed within an unimproved and unused portion of a dedicated state highway easement. Then the state brought an action to compel the landowner to remove the shed. The court compelled the defendant to remove the building even though it did not obstruct uses that were being made of the easement, or interfere with the view of the users of the highway. It was only in that context that the court stated: “Where the sole question is whether the maintenance of the structure or obstruction is inconsistent with the full enjoyment of the right of way by the public, the owner of the fee is deemed to possess no greater rights than those who are strangers to the title.” (*Supra*, 85 Cal.App.2d at p. 656.)

(5a) Nevertheless, we have concluded that under the circumstances of this case, the People did not meet their burden of proof. (6) Under subdivision (k)(1) of *section 602 of the Penal Code*, the statute appellant was convicted of violating, it is not sufficient merely to show that the accused willfully entered upon the fenced lands of another without written permission and then refused to leave the lands when requested to do so; it is also incumbent to prove that the accused's presence on the land constituted a trespass in the sense that he invaded another's exclusive right of possession. (See 1 Rest.2d Torts (1965) pp. 275-276; Prosser, Torts (4th ed. 1971) § 13, pp. 68-69; 75 Am.Jur.2d (1974) Trespass, § 22, p. 24.) Furthermore, a landowner who grants an easement to a gov-

environmental entity for public highway purposes possesses no right with respect to passage and travel thereover that is greater than that of the general public. (*Santa Barbara v. More* (1917) 175 Cal. 6, 10 [164 P. 895]; *Gurnsey v. Northern Cal. Power Co.* (1911) 160 Cal. 699, 705 [117 P. 906]; *Colegrove Water Co. v. City of Hollywood* (1907) 151 Cal. 425, 429 [90 P. 1053]; *People v. Henderson, supra*, 85 Cal.App.2d 653, 656; see 39 Am.Jur.2d (1968) Highways, Streets, and Bridges, § 160, pp. 535-536.) Accordingly, one who uses an easement conveyed for public highway purposes within the scope of the initial grant is not a trespasser against the landowner. (Cf. *Porter v. City of Los Angeles* (1920) 182 Cal. 515, 518-519 [189 P. 105]; 39 Am.Jur.2d (1968) Highways, Streets and Bridges, § 187, p. 565.)

72 Cal.App.3d 278, 140 Cal.Rptr. 82, 7 Env'tl. L. Rep. 20,653

END OF DOCUMENT

(5b) Here, the uncontradicted evidence shows that the only person who requested appellant to leave was George Nickel's security guard. It \*286 was, therefore, the People's burden to prove that appellant was committing a trespass against the landowner when the security guard asked him to leave. Yet the state presented no evidence to show who fenced the unimproved strip upon which appellant was walking or, if the landowner did so, under what conditions the fence was built. For instance, if the county erected the fence that separated the paved portions of Rancheria Road from the unimproved strips for some county purpose, appellant was not committing a trespass against George Nickel when he was asked to leave by the security guard; at the very most, he was committing a trespass against the county by walking on a part of a county easement that had not been opened for public travel. On the other hand, if George Nickel erected the fences without first obtaining a written encroachment permit, he, not appellant, was committing a trespass. (See *People v. Henderson, supra*, 85 Cal.App.2d 653, 656-659.) Because the People's evidence is totally lacking on a vital point, the municipal court's determination that appellant committed a criminal trespass is not supported by substantial evidence.

The judgment is reversed.

Brown (G. A.), P. J., and Franson, J., concurred.  
\*287

Cal.App.5.Dist.  
People v. Sweetser

## COMMENT 5E

## Acquisitions of the Sonoma County Agricultural Preservation and Open Space District

for the 5th Supervisorial District through January 1999; data provided by SCAPOS

### DISTRICT FIVE

PROPERTY NAME, Location	ACREAGE	ACQUISITION PLAN CATEGORY	OPEN SPACE/RESOURCE CONSERVATION DESIGNATION	PROPERTY CHARACTERISTICS	TYPE OF TRANSACTION	RECREATION COMPONENT	BOARD OK	ESCROW CLOSED	PRICE	BARGAIN? (a/c SCAPOS)
<b>BODEGA BAY FIRE PROTECTION DISTRICT</b> Town of Bodega Bay	0.51	THREE	Hwy 1 Scenic Corridor	Scenic Resource (frontage on Highway 1) - Visual Promontory above Bodega Harbor	Conservation Easement		7/14/98	(escrow in proc)	\$50,000.00	
<b>CARINALLI</b> Vicinity of Laguna de Santa Rosa	245	TWO	Adjacent to Hwy 12 South Community Separator - Scenic Landscape Unit - Critical Habitat Area	Scenic Agricultural Lands - Biotic Resource - Rare and Endangered Species - Mature Oak Forest - Various Agricultural Operations	Agricultural/Forever Wild Conservation Easement		5/2/95	6/16/95	\$760,000.00	
<b>CRAMER</b> Occidental Rd, W of Fulton Rd	173	ONE	Scenic Landscape Unit - Scenic Corridor	Wetland Resource - Joint project with Dept. of Fish and Game/Wildlife Conservation Board	Fee	Irrevocable Trail Offer	12/3/96	1/21/98	\$1,650,000.00	
<b>DUTTON RANCH</b> S of Graton, Hwy 116 and Occidental Rd SCs	68.8	TWO	Scenic Landscape Unit - Scenic Corridor	Agricultural Resource - Apple Orchard	Agricultural Conservation Easement		8/15/95	9/15/95	\$315,000.00	Below mkt
<b>GRATON RAILROAD RIGHT-OF- WAY</b> Between Occidental Road, S of Graton to Kay Ln, S of Forestville	15.75	TWO	Santa Rosa/Forestville Trail - Riparian Corridor - Scenic Corridor (portion)	Continuation of 10- mile Trail for Recreation and Alternative Transportation Purposes.	Conservation Easement Regional Parks Holds Fee	West County multi-use trail	5/16/95	5/31/95	\$174,356.00	
<b>GUSTAFSSON (GRAY CREEK)</b> Austin Creek State Rec. Area, W of Healdsburg	30.56	THREE	Critical Habitat Area	Remnant old growth redwood forest; Gray Creek	Forever Wild Conservation Easement	Addition to Austin Creek State Park	1/27/98	3/11/98	\$134,000.00	
<b>HEPPER</b> Estero Americano, near Bodega Bay	86.8	TWO	Scenic Landscape Unit - Critical Habitat - Riparian Corridor	Scenic Agricultural Land - Biotic Resource - Estero Americano - Riparian Habitat	Agricultural Conservation Easement	Land Trust may consider limited access	7/15/97	9/5/97	\$285,000.00	
<b>LORENZINI</b> Between Salt Point SP and Stillwater Cove RP	221	THREE	Scenic Landscape Unit	Forestland Between Stillwater Cove Regional Park and Salt Point State Park	Forever Wild Conservation Easement	Agreement by landowner to donate Fee Title as part of Option Agreement to be exercised by Regional Parks	8/2/94	8/22/94	\$500,000.00	Bargain
<b>MAGERS (GRAY CREEK)</b> Gray Creek Watershed - W of Healdsburg	61.54	THREE	Critical Habitat Area	Remnant old growth redwood forest; Gray Creek	Forever Wild Conservation Easement	Addition to Austin Creek State Park	1/6/98	1/15/98	\$80,000.00	
<b>MONTE RIO SCHOOL DISTRICT</b> 9725 Main St., 1/4 mile S of Monte Rio	4	THREE	Bpheman Hwy Scenic Corridor	Dutch Bill Creek and associated riparian plant communities	Conservation Easement Monte Rio Recreation and Park District holds Fee	Community center and other recreation	9/1/98	(escrow in proc)	\$188,000.00	

## COMMENT 6E

**From:** [Jennifer Kardos](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano at Marsh Road Public Access  
**Date:** Tuesday, April 19, 2022 8:46:34 AM

---

### EXTERNAL

Dear Mr. Helfrich,

I respectfully wish to ask for your support to keep coastal access open to the public. This is one of the tenants in the California Coastal Commission purview as it should be yours as a public servant.

I am a very responsible kayaker. Not only do I respect land, water and animals I seek to make the places I visit better for having been there. I can't tell you how many garbage bags of plastic bags, balloons, golf and tennis balls, rubber duckies, fast food containers, water bottles and other human made trash from the water and the water's edge. My kayak holds are full at the end of the day and I dispose of all of these at home in the correct containers.

My point is that I am not unique, many other paddlers do the same. By allowing our access to the water. You allow gentle use of the environment and an improvement of the conditions of the Estero Americano.

It is also important for us to teach our children to care for the land, we can't do this without access. Blocking access gives a private landowner more rights than the people of California to the public shore. This issue of blocking the road and therefore coastal access should finally be adjudicated in favor of keeping and granting access for the foreseeable future.

I appreciate your consideration of my request. I speak only for myself but I paddle with both Bay Area Sea Kayakers and Western Seakayakers and both clubs have outings here normally limited to ten paddlers. Many people carpool so we are not talking about a large amount of car traffic.

Thank you very much,

Jennifer Kardos

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From: [Dick Mallory](#)  
To: [Gary Helfrich](#)  
Subject: Water access to Estero Americano  
Date: Tuesday, April 19, 2022 11:26:45 AM

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## EXTERNAL

Dear Gary Helfrich, and others

Many of us in the paddling community have accessed the waters of Estero Americano for 20 years and more via the County of Marin's dirt road next to the bridge at Valley Ford/Franklin School road. In addition to kayakers and canoeists we often encounter local fishermen and duck hunters, all of whom expect that we can continue our right to egress public waterways. State law firmly establishes a public right of way where bridges cross waterways. Estero Antonio was fenced off illegally by a local rancher, and we don't want any further restrictions on what is our right to paddle on navigable waterways. I think some of the local ranchers want us kept out because they seem to not recognise the state laws on rights of egress on navigable waters - they may own the land but they don't own the water.

Sincerely

Dick Mallory

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**From:** [Jackie Sarfat](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano access  
**Date:** Tuesday, April 19, 2022 9:54:30 PM

---

EXTERNAL

I am sending this email to express my concern regarding the potential loss of access to Estero Americano via the gravel road off of Marsh rd in Valley Ford. I am a kayaker and have enjoyed the natural beauty of the Estero for more than 20 years by paddling this waterway. I, as well as my kayaking friends, have great respect for the land and have a "leave it cleaner than you found it" belief and practice. It is my desire and request that permanent access to Estero Americano via this site be maintained for the kayaking community along with serviceable toilets. The potential loss of access to this waterway would be devastating to the kayaking community. I and many others would be willing to do whatever it takes to maintain this access point.

Respectfully,  
Jacqueline Sarfati  
Jsingl@inreach.com  
925 595-4622

Sent from my iPhone

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## COMMENT 9E

**From:** [Penny](#)  
**To:** [Gary Helfrich](#)  
**Cc:** [Tom Biglione 2015](#); [john dye](#)  
**Subject:** Estero Americano  
**Date:** Tuesday, April 19, 2022 2:48:00 PM

---

Hello Gary:

I am a resident of Marin County and property owner in Sonoma County. I have also been a non-motorized paddle boater for about 40 years. The Estero Americano was one of the first places I paddled a canoe and later sea kayaks. I have taken kids there to introduce them to the beauty of the Marin/Sonoma countryside and am happy to say that these kids, now adults, feel strongly about the treasure we have here.

That said, I see that the possibility that public access to the Estero at Marsh Road may be in danger of being eliminated. Shame! In all the times I have paddled the Estero I have not seen the horrors mentioned by the adjacent landowners. The Estero I know was/is pristine and a wonderful quiet (except for an occasional Moo) outdoor experience. It has also been a wonderful venue for kayak events allowing newbies to also see this beautiful area in a safe, supervised fashion.

I strongly suggest and recommend that the current public access at Marsh Road be continued and maintained. I recognize that the Marin County Department of Public Works/Roadways was supposed to install an informational sign and to the best of my knowledge they never did. This still needs to be done and maybe a little encouragement from concerned Marin residents might help.

Regards,  
Penny Wells

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**From:** [Thomas Colton](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Sonoma County LCP and Estero Americano  
**Date:** Thursday, April 21, 2022 10:52:23 AM

---



Hi Gary,

I am the president of the Bay Area Sea Kayakers (BASK). Several members have forwarded your responses to their emails about access to Estero Americano. We had initially been under the impression that support was needed to preserve access to the Marsh Road put-in, but we now understand that we need to pursue this with Marin County officials. I'm sorry that you are getting a lot of comments that may not be helpful for your LCP. I would like to know more about the access to the estero that you are proposing so that we can publicize this and solicit more support from the kayaking community. It sounds like the draft LCP has been modified since the latest version posted at <https://tinyurl.com/3zn9e6r4>. So I will quote from the posted draft and ask for some clarifications.

I. The section on the Public Access Plan at <https://tinyurl.com/y3ey5wax> describes some improvements under J-4 Estero Americano Valley Ford Access:

1. Retain the existing Marin County public access point by encouraging Marin County Parks & Open Space District to acquire fee title or record the easement and improve the access. Prescriptive rights may exist.
2. An agency responsible for public access should acquire and develop a similar access point in Sonoma County.
3. Encourage the installation of restrooms at one location between the existing launch point and the mouth of the Estero Americano.

I gather that point 1 has been removed at the request of Marin County.

Is there any more information about point 2? Would that be a kayak access point, with road access close to the water to allow launching?

If point 3 is still in the plan, that would be awesome.

II. Under J-5 Estero Trail:

1. Complete the trail plan, including locating trails and parking areas consistent with  
  
the recorded easements.
2. Implement the plan in phases to allow adaptive management techniques to be fine-tuned to prevent impacts to grazing and natural resources.

From the accompanying maps, it seems that the Estero Trail may start from Highway 1 at

point K-5. If parking is right by the road, then this may not be a good kayak access point. However, if the trail goes down to the Estero at a location where a kayak could land, it might be a good stopping point for kayakers who launch elsewhere on the Estero. One drawback of the current situation is that there are no places to stop between the Marsh Road put-in and the mouth of the estero. Of course, many of us like to hike as well, so will be happy to support hiking access.

### III. Under J-6 Estero Ranch

1. Plan and develop appropriate public access, education, and research compatible with the site's fragile ecosystem.
2. Maintain agriculture and related infrastructure on the preserve to support grassland health.

I'm guessing that this refers to the Estero Americano Preserve, labeled K-2 on the map. If this site were to allow public kayak access, then paddlers could go up or down the estero from here. Can you elaborate on how this might be developed and opened? But it may be that open access is not feasible if there are fragile resources to be protected.

If you could provide a bit more info on the improvements to public access, I'll push to get lots of supportive comments from our members. I understand you need comments by May 1 to include them in the documents for the board of supervisors.

Thank you for your efforts on this plan and for encouraging the paddling community to participate.

Tom Colton

--

Tom Colton  
1515 North St  
Berkeley, CA  
510-847-5771

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## COMMENT 11E

**From:** [Larry Moss](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Sonoma County Local Coastal Plan comment  
**Date:** Thursday, April 21, 2022 10:41:05 AM

---

Dear M. Heifrich,

I am writing to you as a sea kayaker and past president of BASK, Bay Area Sea Kayakers, regarding access to Estero Americano.

I and my fellow kayakers use the access road to haul our kayaks to a put-in at the Estero, a place we love to paddle. Recently, our members were behind the effort to get the large logs removed that were illegally placed to block access (then removed by Marin County due an effort by members of BASK). Now there is an effort to block the suggested Coastal Plan to improve access to the Estero, noting misuse of the property of people leaving trash. We share those concerns but do not believe that misuse by a few should block the intended public access to all.

Me and my fellow kayakers are concerned citizens, often picking up trash as we paddle, even if it is out in the ocean where no one will see it. We paddle the trash back to shore and find a suitable disposal for it. We treat every waterway with the same care, the Estero being no different.

We are not only supporting Sonoma's effort to provide recreational access, but many of us leave dollars in Sonoma as we stop for food or other amenities in the County. Hopefully, in combination with being good environmental stewards we are good visitors.

We loath that people are trashing sites of public access. However, just imagine if the criteria for public access was based on whether people misuse the site by littering. As a former manager for East Bay Regional Parks, as well as an active hiker and biker, I can attest to a frequent sighting of trash. If that was the criteria for public access or no access then there would be very limited recreational activities.

We believe that not only will the Plan improve the site, but with the improvement will come greater care by users as they have facilities that serve them, as opposed to what is now unimproved land with no bathrooms or place to dispose of trash.

The objections to the Plan as it relates to the Estero also concern trespassing, which I contend is a property owner's issue as it is with anyone who owns a home or land. While sympathetic that there are people who trespass, I don't believe the County is responsible for individual property issues.

We sympathize with those who have land bordering the places where trash is left and trespassing may occur. It is obviously complicated by the difficulty to monitor the

area. But we object to the closing off of access like a gated community to the benefit of a few because of the bad actions by a minority of users.

Please retain access to this beautiful location. We promise to be part of the solution, not the problem.

Larry Moss

5836 Mendocino Ave.  
Oakland, CA 94618

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**From:** [patrick.norton](mailto:patrick.norton)  
**To:** [Gary Helfrich](mailto:Gary.Helfrich)  
**Subject:** Estero Americano  
**Date:** Thursday, April 21, 2022 3:14:46 PM

---



Good Day Gary,

This letter is in support of the continued public access to the Estero Americano for recreational users. As a paddler who has frequented the Estero Americano this water trail is an important part of the local recreational landscape. I know that duck hunters as well as kayakers, and canoeists share the same sentiment. As a user of the Estero Americano I was surprised to hear that ranchers and the farm bureau have reported that recreational paddlers have littered and otherwise disrespected the Estero. I have witnessed on more than one occasion recreational boaters removing trash from the Estero. As I myself have done on my forays out to the mouth of the Estero. Judging from the nature of trash I have collected, it is my opinion that most of the trash in the Estero washes in from the ocean at high tide. I have recovered bait boxes for crab traps, rope, bouys, and other marine debris in the Estero.

I hope this letter helps in some small way to maintain public access to this recreational gem. The Estero Americano has a unique personality and charm not found on other waterways.

Thank you so much for your consideration,

Patrick Norton

707-479-4381

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**From:** [Kristine Norton](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Please Keep Access To Estero Americano  
**Date:** Thursday, April 21, 2022 7:19:29 PM

---

Dear Gary,

I'm writing to state my support for keeping Estero Americano open for public and recreational use. I've kayaked the Estero a handful of times since 2007 and have a deep gratitude and respect for the land and water of the area. I've been a kayaker since 2007 and this is one of my favorite paddles in our area. The last time I paddled the Estero was last month where I was able to share the unique experience of paddling through a winding Estero to the ocean with other nature lovers and respectful paddlers. Of the paddlers that I have witnessed, there has always been a leave no trace ethic and many of us have spent time removing found debris from the waterway. Last month I even witnessed a paddler pulling a found plastic tub all the way from the mouth of the estero back- what a workout!

Please maintain access to this beautiful treasure.

In Gratitude,  
Kristine Norton

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**From:** [Trey or Becky Steinhart](#)  
**To:** [Gary Helfrich](#)  
**Subject:** The Estero Americano Trail and paddle  
**Date:** Thursday, April 21, 2022 3:45:16 PM

---

My wife and I have kayaked the the Estero Americano from the bridge near Valley Forge to the ocean only three times, tho it remains one of my favorite paddles. However, the wind can blow against you coming out and going back, lol, at times. I have fond memories of walking across the spit at the end to have lunch at the beach, passing the Whales Tale rock, and enjoying the calm meandering slough. We have always been respectful of the land owners, and used care and respect when launching and landing. We always take more trash out from that of which others left.

Please allow public access and continued sharing of this rare passage to the ocean.

Trey and Becky Steinhart  
Stockton, CA  
209-471-8438

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## COMMENT 15E

**From:** [Rudy Tescallo](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano  
**Date:** Thursday, April 21, 2022 10:36:23 AM

---

EXTERNAL

Gary,

As a born and raised Sonoma County resident I want to let you know my stance on the Estero Americano access point in question. I have been accessing this waterway for the last few years and can say it is a place of refuge for me outside of my stressful day to day to see a less populated and natural landscape of Sonoma County. It is important to me to kayak there and I hope the access to this entrance remains open.

Regards,  
Rudolph Tescallo

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**From:** [Dick Mallory](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Sonoma County Estero Americano plan  
**Date:** Friday, April 22, 2022 10:54:47 AM

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Hi Gary,

I want to say I wholeheartedly support the County's plan to develop access to Americano Estero, and the water trail.

I know the surrounding landowners have voiced numerous concerns about trespassing and littering. But that happens when you have public access, it's hard to keep uninformed visitors from flaunting the rules and making a mess occasionally. However, completely shutting out the public from the coast is not the way we do things in California. The organized kayak clubs encourage their members to inform the casual visitors to not trespass and to pick up after themselves.

I did contact Marin County supervisor Denniss Rodini and he said they support passive recreational use of the estero. That's a good start.

They are not planning on closing the Marsh Rd. access. So, the Sonoma County plan has the backing from the major kayak clubs. I have spoken to some of the local fishermen, and they are also onboard with access and respect for private property.

thanks

Dick Mallory

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**From:** [Warren Wiscombe](#)  
**To:** [Gary Helfrich](#)  
**Subject:** kayaking the Estero Americano  
**Date:** Saturday, April 23, 2022 4:23:41 PM

---

Gary, you may have been deluged with emails about access to the Estero Americano, so I'll be brief. First, kayakers are born environmentalists, and the last thing they would do is foul their own nest. The charge that kayakers are polluters, litterers, etc., is just nonsense. We kayakers don't mention the fact that cow dung from the ranches washes into the Estero after every rain, but we believe in live and let live, and so should the ranchers.

Second, this is one of the rare places in Sonoma County that beginner kayakers can leverage up their skills. The Estero can be hard--the wind turned us back once, and you can get stuck in mud--but it is not dangerous, so beginners can learn to deal with difficulties without risking their lives. This makes for better kayakers who won't as easily create rescue situations in the future. In short, the Estero is a challenging but safe environment for improving the abilities of kayakers.

I hope you-all can see fit to provide us with a better launch spot than Marsh Rd, which is OK at higher water levels but problematic and muddy at lower levels.

Yours,  
Warren and Helenka Wiscombe

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## COMMENT 18E

**From:** [Jay Mulligan](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano kayak access in Sonoma County.  
**Date:** Monday, April 25, 2022 9:30:31 AM

---

Mr. Helfrich,

I understand access to the water for kayakers is under review. Please do everything possible to maintain and improve access to the estero from Sonoma County at Valley Ford Estero Road and near the mouth of the estero. I have paddled and hiked in the area several times. It is a beautiful area and I appreciate the access. Please do everything possible to maintain current access and add additional if feasible.

Thank you for your consideration.

Jay Mulligan  
415 971 2739

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## COMMENT 19E

**From:** [Lynda Ingram](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano  
**Date:** Thursday, April 28, 2022 8:15:18 AM

---

I am a member of Petaluma Paddlers, but I have paddled many times with other paddlers, as I live in western Petaluma, off of Bodega Avenue.

I don't recall exactly when I first discovered this hidden gem of a paddling location. I bought my first kayak in 1998, so surely by 2000. I have lived in this house with my now deceased husband and 2 grown married sons for over 40 years.

I had a hip replacement surgery over a year ago, so my kayaking has been limited for quite a while. I am ready to get back into my favorite sport, and the beauty of the area where we live.

I know that there have been some access issues. I never paddled with anyone that was not respectful of all the beauty and wildlife that surrounds us.

I believe that my first time on the Estero Americano may have been with a volunteering position for Sonoma Land Paths. The person in charge described the paddle to the coast as " a thrill if you have never been to New Zealand to see the Fiords!" The beauty of the coast is incredible.

Thank you,  
Lynda Ingram

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**From:** [Thomas Colton](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Public access to Estero Americano  
**Date:** Friday, April 29, 2022 7:14:35 PM

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EXTERNAL

I'm writing in support of the improved public access measures to Estero Americano in the proposed Sonoma County Local Coastal Plan.

I have been paddling down the Estero from the Marsh Road access since 2004, often once or twice a year in a sea kayak. After cancer treatments in 2019 I was restricted from water contact for a few years due to a compromised immune system, but am now recovered and just returned in March to the Estero. The route down is remarkable, starting with a tightly winding brackish creek, broadening into wide valleys with lush green hills, and then a narrow canyon where the Estero nears the mouth. Most recently, the free flowing mouth afforded delightful play in the current and swells traveling up the outflow. Cows, deer, river otters, bobcats, osprey, great blue herons, egrets, and various ducks are often found. The view of the coast from the bar at the mouth is one of my favorites; sea stacks to the south, Tomales Point and Bodega Head, and a steep sand beach. I have also paddled up to the mouth from Tomales Bay and landed on the bar in mild conditions. I have paddled many parts of the California coast, and this is one of my favorites. I would like the public to enjoy the unique natural beauty of this river.

The proposed new trail for hiker access to the Estero, possible kayak landings/launch spots, and public restrooms would allow access to a wider range of users. Currently, kayakers who can paddle the 12 mile round trip to the bar at the mouth are about the only users who can access the area. There are no intermediate stops where one can land, and no restrooms. I would love for hikers to be able to experience this area as well.

I have not witnessed bad behavior by other boaters along this route, but we find small amounts of trash in the water which we collect and remove. We occasionally have encountered hunters camped on private land in the upper part of the Marin County side doing target practice, but they have been considerate of boaters.

I hope that the new Local Coastal Plan will encourage improved public access to this unique treasure.

Sincerely,

Tom Colton

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Tom Colton  
1515 North St  
Berkeley, CA

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## COMMENT 21E

**From:** [Henry Nagle](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano  
**Date:** Friday, April 29, 2022 10:03:18 PM

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EXTERNAL

Hello Gary!

I am a member of Bay Area Sea Kayakers. I just wanted to add my voice to the chorus of conscientious kayakers who value and respect the Estero Americano and the surrounding private lands. Access is important to me, as is keeping good relations with the local landowners.

Thanks very much for your work on our behalf!

Henry Nagle

Santa Rosa, 95404

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## COMMENT 22E

**From:** [Hollie Smith](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano  
**Date:** Friday, April 29, 2022 9:21:55 PM

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As a Somoma County paddler who has paddled the Estero numerous times, I just wanted to lend my support for both protection to the area, and access for the public to enjoy this jewel of nature. Of course protection and public access can seem to be at odds with each other at times ; but if access is done with thought and care, both should be accomplished. I think some tensions could be worked out between users and property owners if the concerns could be better aired as to exactly what the issues are. Paddlers have been aware of tensions from ranchers, but have never able to have dialog with property owners to work out solutions. Duck hunters, fishermen and paddlers access the area and it is unclear what sort of impact these differing parties have. I think better signage informing rec users for the area would help : signs showing park or preserve areas and where the **boarders** of private land *exactly* are for instance. I think it would be great to have a few trails, parking areas, and restrooms on down the line. Thanks for all you do to facilitate public enjoyment of parks in our county.

**Hollie Smith, 1141 Piner Creek Dr. Santa  
ROsa ca, 95401, 707-326-6537**

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**From:** [Dick Mallory](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano access plan  
**Date:** Saturday, April 30, 2022 7:47:23 AM

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Hi Gary,

I am in full support of the Sonoma County plans to increase access to Estero Americano. I understand that much of the land surrounding the Estero is private property and that the landowners should be protected from trespassers, but I also understand the new plan for access is for the use of the Land Bank properties and the Estero waterways (which are under the public domain.) I have been paddling on the waters of the Estero for 20 years and find the area unique and beautiful and would love to see it preserved for public appreciation. A parking lot on Land Trust property, trails and a staging area, along with signage about the responsible use of public land would be a very nice addition to Sonoma County.

Sincerely,  
Dick Mallory

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**From:** [Alan Kepner](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano access  
**Date:** Sunday, May 01, 2022 10:08:39 AM

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COMMENT 24E

Dear Mr. Helfrich,

I just want to send you this quick message to urge you to support general public and specifically kayak access to Estero Americano. This is a unique resource that contains a host of natural features that need to be preserved for all to enjoy. I have been down the Estero many times by kayak. The views are awesome as they unfold at every turn, and change over the seasons, plus the sanctuary there for wildlife.

I have "first time" wildlife sightings in my kayak, that are connected to the Estero. I saw my first Golden Eagle in flight on one of my first paddles down the Estero. I also remember seeing a mountain lion make his way from the opposite ridge and down the hill side to the water's edge, while we all gazed silently, afraid to breathe too loudly. Other regular sightings include river otters, herons, egrets, kingfishers, and an assortment of land and water birds.

Please support continued kayak access to Estero Americano.

Sincerely,

Alan Kepner

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**From:** [Chris Ogilvie](#)  
**To:** [Gary Helfrich](#)  
**Subject:** Estero Americano access  
**Date:** Sunday, May 01, 2022 10:26:25 PM

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EXTERNAL

Hello Gary,

I would like to express my support for maintaining, and even improving access to the Estero Americano waterway. I have enjoyed paddling there with my kayak for over a decade. In all that time I have used the only available access at Marsh Road on the Marin County side.

Basen on that rather limited access point, I would love to see other, and perhaps better access points along the Estero.

I would like to encourage Sonoma County to further responsible use of the Estero as a waterway, while at the same time respecting the needs of the landowners.

Thank you,

Chris Ogilvie

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**From:** [mike.prindiville](mailto:mike.prindiville)  
**To:** [Gary Helfrich](mailto:Gary.Helfrich)  
**Cc:** [tcolson@berkeley.edu](mailto:tcolson@berkeley.edu)  
**Subject:** Estero Americano Public Access  
**Date:** Sunday, May 01, 2022 7:45:48 AM

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COMMENT 26E

Gary and Sonoma County Planning,

Appreciate your continued support for public access to the Estero Americano near Valley Ford to the coast. As a frequent visitor to this area, the estero is an amazing natural treasure with a diversity of wildlife across seasons, tides, and weather conditions. Together with my family we kayak the Estero Americano often, and appreciate any efforts to preserve and expand access for responsible use and preservation.

Attached is a recent article from The Press Democrat where I was photographed by a local reporter removing trash on the coast. Not easy towing a garbage can several miles, but I know many of our fellow kayakers make a special effort to preserve and protect the natural environment we enjoy from our crafts.

My contact information is below if you have any questions, feedback, or suggestions on how our family can help, and thank you for all that you do to represent our community.

- Mike Prindiville  
BASK member  
[mikeprindi@gmail.com](mailto:mikeprindi@gmail.com)  
408-718-1785

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**From:** [Beth Bruzzone](#)  
**To:** [Gary Helfrich](#); [Eric Koenigshofer](#)  
**Subject:** Current LCP Public Access Maps vs Proposed 2020 Public Access Maps  
**Date:** Friday, May 13, 2022 6:04:54 PM  
**Attachments:** [Coastal Plan Access Maps.pdf](#)

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EXTERNAL

Dear PRMD and Planning Commission....

There has been much contention regarding the proposed LCP Public Access Maps, particularly sub area 10, figure C-PA-1k.

All 5 markers are being disputed in one form or another. To summarize my, and others, previous comments; K-1 is placed on private property with no permission from the property owner, K-2, is not accessible to the public other than by the environmentally sensitive Estero Americano or by trespassing on private property, K-3 is also on private property with no authority from the property owner, K-4 is in Marin County and has no place on the Sonoma County LCP Maps, and K-5 is on the Bordessa Property, a partially conserved, yet highly contested proposal, unlikely to become active for many years, if ever.

An argument to justify these markers on the proposed maps came to light, brought forth by Regional Parks, at one of the last Planning Commission LCP meetings and other comments. The argument is that some of these markers existed on the current 1979/2001 LCP maps, and have never caused any issue for anyone until recently, therefor should remain.

This is a falsehood. Below is an attachment of the current maps. One can see for themselves that the markers do not exist on the current maps.

Again, I state markers K-2 and K-1 have been causing trespassing problems since the maps began to appear online, approximately 2015. There is no current plan for access on any of these marked points in Sonoma County. If, and when public access is solidified, then the maps can be digitally altered to reflect the update.

Sincerely.....

Beth Bruzzone  
Bodega/Valley Ford CMAC

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