

2021-2022 LCP Comment Tables Addendum

Comment #	Comment Date	Name	Organization	Address	Email	LCP Section	Category	Multiple	Summary
1-1	6/21/21	Spaletta, Nichola	N/A	The Spalettas Box 506 Valley Ford, CA 94972	nspaletta@gmail.com	Public Access	Trails/Map Revisions	Y	9/19, Appendix B: Public Access Plan page 87 (I-34) Short-Tail Gulch Trail. This trail will negatively impact a fragile ecosystem and it doesn't connect to the Marin maps.
1-2	6/21/21	Spaletta, Nichola	N/A	The Spalettas Box 506 Valley Ford, CA 94973	nspaletta@gmail.com	Public Access	Trails/Map Revisions	Y	Valley Ford Subarea 10(Figure C-PA-1K): creating unmanaged trails in fragile ecosystems will cause many problems. The way it is phrased implies that people can walk along the coast in one direct trail, but this phrase will cause trespassing.
1-3	6/21/21	Spaletta, Nichola	N/A	The Spalettas Box 506 Valley Ford, CA 94974	nspaletta@gmail.com	Public Access	Trails/Map Revisions	Y	J-2 Estero Marker Preserve-> marker is now listed as K-2. Changing the wording is essential as the posting and wording invites trespassing.
1-4	6/21/21	Spaletta, Nichola	N/A	The Spalettas Box 506 Valley Ford, CA 94975	nspaletta@gmail.com	Public Access	Trails/Map Revisions	Y	J-3/K-3: There is no developed access water facility on the Estero Americano. The waters of the EA have the most significant habitat in the state. Marin County only allows scientific study or restoration at EA. SoCo wants to develop that same body of water by creating more boat launch sites and bathrooms. Doing so will decimate the EA waters and shores with increased public population.
1-5	6/21/21	Spaletta, Nichola	N/A	The Spalettas Box 506 Valley Ford, CA 94976	nspaletta@gmail.com	Public Access	Trails/Map Revisions	Y	The road people use for launching is not Valley Ford Estero Road, it is Marsh Road and it is private in Marin County. The proposed Estero Americano Water Trail is also in Marin County and needs to be removed from the map. There are two letters attached from Tom Lai of Marin County asking for removal of markers (K-2) and (J-4)/(K4). Marin County also asks that wording regarding California Coastal Trail along coast from Doran Regional Park to the Marin County line at the Estero Americano to be removed. MC also asks that this CCT trail be aligned inland on Highway One (Map #25).
2	2/23/22	Spaletta, Nichola	N/A	The Spalettas Box 506 Valley Ford, CA 94977	nspaletta@gmail.com	Public Access	Trails/Map Revisions	N	Concerned about the impacts of trail development along the EA.The locations of potential boat launch spots clearly demonstrate sensitive habitat areas, such as wetlands, tidal salt marshes, and riparian corridors. Increasing the number of boat launch spots will negatively affect species living in or around the Estero which will cause irreversible damage. Markers that are in Marin County need to be removed from the map. MAP 25 and FIGURE C-PA-1k are attached.
3	3/8/21	Lai, Tom	Marin County Planning Dpt	3501 Civic Center Dr Suite 308, San Rafael	tlai@marincounty.org	Public Access	Trails/Map Revisions	N	Response to the Spaletta Families letters. Marin Local Coastal Program identifies the proposed coastal trail alignment inland along Highway 1 which provides a seamless transition into the proposed alignment at Valley Ford.
4-1	5/12/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	Public Safety Suggestions	Y	Permit Sonoma Code Enforcement Violation Penalty Fees: Comment: These violation fees comprise insignificant disincentive to prevent coastal development. Recommendation: For violations of permit conditions, zoning and code, increase the per-day violation fee for all violations in the Coastal Zone compared to the rest Sonoma County to a rate that is truly disincentivizing (eg, \$100-300 per day for first violations, \$300-600 per day for second violations and \$1000 per day for third violations), in addition to the other mitigating measures listed.
4-2	5/12/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	Public Safety Suggestions	Y	Policy C-PS-3b: Comment: It would be an error of permitting to approve an "intensity of development" in an area that "requires a high level of protection" from flooding in the first place. Recommendation: Drop the rest of the policy after the words:....damage of flooding."

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4-3	5/12/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	Public Safety Suggestions	Y	<p>Policy C-PS-3g: Comment: There are already guidelines requiring expert (eg, geologic) assessments for every development permit application. The term “case by case basis” may imply to applicants that requirements may be discretionarily waived. Recommendation: Change the words:”proposed development as stated in Policies C-PS-2f and i, and according to independent standards based on the best science available, to ensure that.....”.</p>
4-4	5/12/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	Public Safety Suggestions	Y	<p>Policy C-PS-4f: Comment: New development adjacent to wetlands is to be prohibited within 100’, according to the following Policy, -4g. Recommendation: Change the wording of this Policy to: “For undeveloped land immediately adjacent to wetlands..... flooding, new development applications will be referred for California Coastal Commission review. Wetland and habitat restoration projects will be strongly encouraged instead.”</p>
4-5	5/12/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	Public Safety Suggestions	Y	<p>NOTE: CalFire’s Fire Hazard Serverity Zone Mapping has changed since this LCP Draft’s Wildland Fire Threat maps were drawn.</p>
4-6	5/12/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	Public Safety Suggestions	Y	<p>General Recommendations 1-1: Access roads to any residence, school, hospital, or public facility, etc, should be at least 15’ wide, to allow for simultaneous evacuation and first response.</p>
4-7	5/12/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	Public Safety Suggestions	Y	<p>General Recommendations 1-2: The document “Living in a Fire-Adapted Landscape”, produced by Sonoma County Ag and Open Space and Greenbelt Alliance through The Watershed Collaborative project and approved by the Sonoma County Board of Supervisors in 2018, is important to include as a guideline and reference in the Public Safety Element. It was written expressly in response to the climate change impacts of both fire and drought in Sonoma County. It should be mentioned under Section 1.3–Relationship to Other Plans and Regulations and more details should be given in Section 6.1.2, Land Use Planning, under Wildlands Fire Hazard Policy.</p>
4-8	5/12/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	Public Safety Suggestions	Y	<p>General Recommendations 1-1 for C-PS-5: Policy itself should reflect the actual recommendations applicable to agricultural and open space lands below: “Priority Actions: Land Management 1. Take actions to protect natural and agricultural lands in the short and long term. Key concerns include water quality impacts, sensitive habitat damage, road and slope failures, and invasive plant proliferation. a. Focus fire-related sediment and toxin contamination control efforts on rural home sites near waterways and steep slopes, and remove hazardous debris from waterways. b. Evaluate and prepare necessary culvert and road repairs for infrastructure damaged by fire or by subsequent debris flows and higher stormflows. c. Prepare for invasive species management on burned lands. d. Implement land management best practices within 100 feet of creeks.</p>

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4-9	5/12/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	Public Safety Suggestions	Y	<p>General Recommendations 1-2 for C-PS-5:</p> <p>2. Restore sensitive natural landscapes disrupted by fire and prefire degradation. Some areas may require active management, including erosion control, native plant revegetation, etc.</p> <p>a. Collect fire-related hazard trees for use as large woody debris in riparian restoration projects.</p> <p>b. Identify high-sensitivity natural areas that may need restoration (e.g., high-intensity burn areas, graded areas in high quality or rare vegetation types, riparian habitat) and implement forward thinking, with climate change resilient restoration projects based on best available science.</p> <p>c. Repair damage to lands caused by fire suppression [bulldozer lines and other fire breaks, fire retardant, etc.]</p> <p>d. Improve wetland habitat waters.</p> <p>e. During fire-restoration activities, include pre-fire-degraded areas in targeted enhancements.</p>
4-10	5/12/22	Morgan, Laura	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Public Safety	Public Safety Suggestions	Y	<p>General Recommendations 1-3 for C-PS-5:</p> <p>3. Increase local capacity to effectively prevent build-up of dangerous fuel loads, enhance environmental benefits, and protect escape routes.</p> <p>a. Create and maintain firebreaks that provide multiple benefits beyond fuel load reduction, including agriculture, recreation, biodiversity, water supply and quality, and carbon sequestration.</p> <p>b. Expand local capacity for utilizing prescribed burns to manage fuels and maintain healthy ecosystems.</p> <p>c. Support establishment of Forest Health Districts or a similar mechanism to provide structure, funding, and resources for rural landowners to collectively manage forest lands in ecologically sound manner.</p>
5	5/12/22	Morgan, Laura/ Higgins, Cea	Save the Sonoma Coast	Save the Sonoma Coast	thesquig@yahoo.com	Biotic Protections	ESHA	N	<p>I have not seen any policy which directly promotes restoration of ESHA. Labeling ESHA as "degraded" has often lead to allowing development of ESHA rather than ensuring restoration of degraded ESHA.</p> <p>Please add a new Policy: Ecological Restoration: Encourage the restoration and enhancement of degraded ESHAs and the creation of new ESHAs, and streamline regulatory processes whenever possible to facilitate the successful completion of restoration projects."</p>
6-1	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Safety Suggestions	Y	<p>The 2021 Draft fails to include many sections from the CA Constitution and Coastal Act. Not only are these Sections not referenced in the 2021 draft LCP: they are similarly not considered throughout the 34 NEW Public Access policies which ignore:</p> <ul style="list-style-type: none"> ● coastal carrying capacity or capacity of site to sustain use, ● proximity or impacts to adjacent residential uses, ● topographic and geologic site characteristics-including siting public access amenities in areas vulnerable to sea level rise or erodible bluffs ● fragility of the natural resources in the area and avoidance of impacts to ESHA
6-2	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Relationship to Other Elements	Y	<p>Public Access Element is missing a "Relationship to other Elements" which is included for all of the other elements in the draft. There should be a paragraph which identifies which other elements of the Plan were considered when preparing the Public Access Element.</p>

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6-3	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	2.1 Legal Basis for Public Access: California Coastal Trail legislation SB908 should be listed and the standards set forth which include that The California Coastal Trail should be constructed in a manner that is consistent with the protection of coastal resources and shall be developed in a manner that demonstrates respect for property rights and the proximity of the trail to residential uses, and that evidences consideration for the protection of the privacy of adjacent property owners.
6-4	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Coastal Trail Alignment should adhere to five principals and those Coastal Trail principles should be listed and considered properly in the Public Access Element. They include: 1. Proximity: Wherever feasible, the Coastal Trail should be within sight, sound, or at least the scent of the sea. 2. Connectivity: The trail should effectively link starting points to destinations. 3. Integrity: The Coastal Trail should be continuous and separated from motor traffic. 4. Respect: The trail must be located and designed with a healthy regard for the protection of natural habitats, cultural and archaeological features, private property rights, neighborhoods, and agricultural operations along the way 5. Feasibility: To achieve timely, tangible results with the resources that are available, both interim and long-term alignments of the Coastal Trail will need to be identified.
6-5	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	To more closely adhere to Coastal Act mandates, GOAL C-PA-1: should be rewritten to state GOAL C-PA-1: Enhance public access to and along the Sonoma County coast. Avoid adverse impacts from public access to cultural resources, public safety, public health and the environments especially environmentally sensitive habitat areas (ESHA); and minimize adverse impacts from development on public access.
6-6	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Policy C-PA-1d: This policy should be reworded to guarantee a public process as well as include & require the approval and review by the California Coastal Commission. "Assistance" is not defined. If the County is to be involved with legal proceedings than the type of assistance (legal fees, staff time, enforcement...) provided should be clearly listed.
6-7	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Policy C-PA-1i Rewording: Sonoma County shall either accept or assist in finding another public agency or non-profit organization to accept Offers of Dedication which increase opportunities for public access to the coast consistent with the County's ability to assume liability and maintenance costs.
6-8	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Policy C-PA-1l: This Policy should read: A verticle accessway.... because as worded it inures rights beyond the scope of what is guaranteed in Section 4 of Article X of the California Constitution
6-9	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	The Following objectives should be added or reworded for the California Coastal Trail: Reword Objective C-PA-2.9: Provide an educational experience through interpretive facilities that are multi-lingual where feasible. Add Objective C-PA-2.10: Alignment of Coastal Trail should avoid areas vulnerable to SLR or bluff erosion.
6-10	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Reword Policy C-PA-2a: Provide a safe, continuous walking and hiking trail as close to the ocean as possible using the following standards: Where it is not feasible to locate the trail along the shoreline due to natural landforms, sea level rise vulnerability, bluff erosion or legally authorized development that prevents passage at all times, inland bypass trail segments located as close to the shoreline as possible should be used. Shoreline trail segments that may not be passable at all times, or that are not passable by bicycles, should be augmented by inland alternative routes that are passable and safe for pedestrians and where appropriate for bicycles.

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6-11	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Reword Policy C-PA-2d: The California Coastal Trail should use existing oceanfront trails, beach routes, and recreational support facilities to the maximum extent feasible.
6-12	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Safety	Y	Public Safety: the Sonoma Coast is a rugged shoreline predominated by unsafe beaches and shoreline. There is no mention of the nature of the Sonoma Coast nor any goals, objectives, or policies which address safety concerns for the public to include interpretive panels along the Coastal Trail and at trailheads or parking areas, the need for guardrails or other protective barriers, alignment of Coastal Trail to avoid dangerous shoreline.....
6-13	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Reword Policy C-PA-2f: Provide low cost overnight camping and lodging facilities at periodic intervals along the California Coastal Trail corridor while avoiding ESHA or areas of biological diversity to support long term hiking and bicycling excursions.
6-14	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Reword Policy C-PA-2g: The Coastal Trail should be designed and located to avoid impacts to environmentally sensitive habitat areas to the maximum extent feasible. Where necessary to prevent disturbance to sensitive species, sections of the trail may be closed on a seasonal basis. For situations where impact avoidance is not feasible, alternate alignments should be provided. If alternate alignments are not feasible, appropriate mitigation measures should be incorporated, including but not limited to, use of boardwalks, reducing trail width and protective fencing.
6-15	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Water Resources	Water Resources	Y	Reword Policy C-WR-1n: Remove abandoned buildings within the alignment of future Coastal Trails along the Sonoma Coast. Consider preserving portions of these structures to remain if they provide coastal access or low-cost accommodations and can be maintained in safe condition.Placing Policy C-WR-1n in the Coastal Trail discussion of the Public Access Element only serves to facilitate construction of a Boardwalk along the Bay which is controversial due to vulnerability to sea level rise and impacts to sensitive habitat or Commercial Fishing.
6-16	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	...There are inadequate goals, objectives, or policies in the Planning & Development section 4.1 to ensure that access facilities will be designed, managed, or located to minimize conflicts with residential development. For example: policies that follow Locating and Developing Parking Improvements (page 17 & 18) do not consider conflicts with residential uses or existing residential development.
6-17	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Reword 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 significantly impact the environment or create conflicts with residential areas.
6-18	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Remove Policy C-PA-3c: This policy as written promotes development in sensitive areas by allowing work around alternative mitigations.
6-19	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Remove Policy C-PA-4e: Until completion of Program C-PA-3 continues to apply zoning permit standards for temporary private events on public beaches that do not involve structures or other coastal development.
6-20	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Reword Policy C-PA-6d: Encourage the establishment of waterway trails in non-sensitive areas away from wildlife breeding or feeding habitat for non-motorized boating to promote environmentally sensitive water based education, recreation, and tourism. Provide information at launch sites for safe and responsible boating including identification of sensitive areas and species and behaviors to avoid impacts to sensitive areas and species. (NEW)

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6-21	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Remove Program C-PA-3: Consider developing policies for review of applications for temporary private events on a public beach that consider: public or private use; type of associated coastal-dependent activities; displacement of public use; number of people; season, weekday or weekend, and hours; location and area relative to size of beach and public accessways; pedestrian access; transportation and parking; amplified music and other noise; equipment; temporary structures and enclosures; food service; warming fires; signage; admission fee; wastewater and solid waste disposal; and required mitigation measures. (NEW)
6-22	5/12/22	Higgins, Cea	Coastwalk California Coastal Trail Association	CoastWalk Trail	cea@coastwalk.org	Public Access	Public Access Recommendations	Y	Remove Program C-PA—4: Evaluate the feasibility of a Bodega Bay water taxi to connect existing recreational and commercial facilities and reduce automobile dependency. (NEW) This is an outdated and unpopular program proposal. Motorized traffic across Bodega Bay should be discouraged as it will interfere with commercial fishing, non-motorized recreational boating, and poses impacts to sensitive areas. This is primarily a tourism draw and not a local serving amenity.
7-1	4/29/22	Joe and Al Bordessa, C/O Andrea Leisy, RMM	Remy Moose Manley	555 Capitol Mall Suite 800, Sacramento, CA 95814	aleisy@rmmenvirolaw.com	Land Use	Public Access	Y	The Bordessa Ranch possesses an abundance of biological resources including providing habitat for a number of special-status plant and wildlife species that constitute environmentally sensitive habitat areas (ESHA) under the Coastal Act. Maximizing public access over the Bordessa property to the Sonoma County Coast, as proposed in the Public Access and Open Space Elements of the LCP Update, will significantly degrade the existing ESHA and is inconsistent with the Coastal Act. There will be unavoidable public safety impacts and will preclude the Ranch from continuing to be used for cattle grazing and breeding, also in violation of the Coastal Act.
7-2	4/29/22	Joe and Al Bordessa, C/O Andrea Leisy, RMM	Remy Moose Manley	556 Capitol Mall Suite 800, Sacramento, CA 95814	aleisy@rmmenvirolaw.com	Land Use	Public Access	Y	Comment 1: Allowing public access over the Bordessa Ranch is inconsistent with the Legislature's intent under the Coastal Act. The Bordessa Ranch is privately-owned and functions as a cattle ranch, an agricultural use which takes priority over public access. The conservation easement over the Ranch also prioritizes agricultural use over recreation and educational uses, e.g., public trails. Any proposed public access to the property as identified in the LCP Update is subject to the terms and conditions of the trail easement which obligates the Open Space District to consult with the Bordessas regarding the precise locations of the trail corridors on the property. The Open Space District's failure to act (no completion of Final EIR) has resulted in a cloud over the Bordessa Property and the family's desired uses, thereby compromising their property rights.
7-3	4/29/22	Joe and Al Bordessa, C/O Andrea Leisy, RMM	Remy Moose Manley	557 Capitol Mall Suite 800, Sacramento, CA 95814	aleisy@rmmenvirolaw.com	Land Use	Public Access	Y	Comment 2: Public access to the Bordessa Ranch will significantly degrade ESHA. The Draft EIR analyzing public access to the Bordessa Ranch discloses that increased human activity due to trail use, including the inevitable off-trail use, by visitors would disturb special-status wildlife species or habitat and destroy special-status plant populations. As proposed, there are no safeguards to ensure that users of public access trails on the Bordessa Ranch would not venture off the trail to pursue a frog, photograph flowers, or explore nearby areas. The LCP Update does not acknowledge these ESHA impacts.
7-4	4/29/22	Joe and Al Bordessa, C/O Andrea Leisy, RMM	Remy Moose Manley	558 Capitol Mall Suite 800, Sacramento, CA 95814	aleisy@rmmenvirolaw.com	Land Use	Public Access	Y	Comment 3: Trails are not a permitted or conditionally permitted use in the Land Extensive Agriculture zoning district. The Bordessa Ranch is zoned Land Extensive Agriculture (LEA). The purpose of this designation is to "enhance and protect land best suited for non-intensive agriculture of relatively low production on relatively large parcels, by establishing densities and parcel sizes that are conducive to continued agricultural production." (Land Use Element, p.LU-6.) Notably, trails or recreational use are not a permitted or conditionally permitted use in the LEA District. (See County Code, §§ 26C-31, 26C-32.) Accordingly, allowing public access trails on the Bordessa Ranch is inconsistent with the LCP Update and the County Zoning Code.

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7-5	4/29/22	Joe and Al Bordessa, C/O Andrea Leisy, RMM	Remy Moose Manley	559 Capitol Mall Suite 800, Sacramento, CA 95814	aleisy@rmmenvirol aw.com	Land Use	Public Access	Y	<p>Comment 4: Public access to the Bordessa Ranch will exacerbate the existing traffic safety hazard on Highway 1.</p> <p>The LCP Update acknowledges that due to narrow shoulders, inadequate sight lines, narrow travel lanes, and limited opportunity for safe passing, roads in the coastal zone such as Highway 1 create unsafe conditions for all road users, especially bicyclists and pedestrians. The increase in traffic and congestion along Highway 1 is especially acute on the weekends near the Estero Trail project area. (Ibid.) Traffic has increased even more during the COVID-19 pandemic, with fatal car crashes continuing to occur. The Draft EIR prepared for the Estero Trail identifies a significant cumulative traffic impact due, in part, to the increase in traffic resulting from allowing public access to the Bordessa Ranch and concludes that a left-turn lane into the property is warranted.</p>
7-6	4/29/22	Joe and Al Bordessa, C/O Andrea Leisy, RMM	Remy Moose Manley	560 Capitol Mall Suite 800, Sacramento, CA 95814	aleisy@rmmenvirol aw.com	Land Use	Public Access	Y	<p>Comment 5: Public access would adversely impact existing agricultural use. In prioritizing coastal access, the Coastal Act dictates that “development designed to enhance public opportunities for coastal recreation shall have priority” ... “but not over agriculture.” (Pub. Resources Code, § 30222, emphasis added.) As set forth above and in our prior comment letters, the Bordessa Ranch is an active cattle ranch. The trail corridors proposed in the Draft EIR do not consider a description of existing pastures and grazing/breeding use.</p> <p>The safety of trail users must be considered due to the potential interaction between humans and cattle, some of which are bulls that can be aggressive during breeding season and cows who are very protective of their calves. Given this, allowing unfettered public access to the Bordessa Ranch is infeasible considering potential impacts to public safety and interference with existing agriculture use. The LCP Update should therefore eliminate the public access contemplated over the Bordessa property.</p>
7-7	4/29/22	Joe and Al Bordessa, C/O Andrea Leisy, RMM	Remy Moose Manley	561 Capitol Mall Suite 800, Sacramento, CA 95814	aleisy@rmmenvirol aw.com	Land Use	Public Access	Y	<p>Comment 6: Conclusion and Request for Notice</p> <p>Future revisions to the LCP Update must delete the public access proposed to, and over, the Bordessa Ranch as inconsistent with the Coastal Act, including the priorities to protect agricultural uses and ESHA. Such wholesale public access, as contemplated in the Update, also cannot be implemented consistent with the terms of the executed trail and conservation easements, and therefore it is infeasible as a matter of law, a problem that should not be circumvented by relaxing buffer and mitigation requirements designed to protect ESHA and other sensitive biological resources. Finally, we reiterate our request to be provided with copies of any and all future public notices and hearings issued in connection with the LCP Update, including by email. Thank you for the opportunity to comment on the LCP Update and for your consideration of our clients’ comments and concerns.</p>
8-1	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT “K-2”	pprows@briscoela w.net	Public Access	Biotic Protections	Y	<p>“Access Point/Trailhead K-2”: This assessment addresses potential impacts of public access to wetlands, sensitive habitats, and sensitive species in and near the proposed Public Access Point.</p>
8-2	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT “K-2”	pprows@briscoela w.net	Public Access	Biotic Protections	Y	<p>Location/Setting: The proposed Public Access Point is along the north bank of the Estero Americano, approximately 4 miles west of Valley Ford, in Sonoma County, California (Figure 1). The proposed Public Access Point is mapped on a steep hillside in the southwest part of a 46+/- acre parcel adjacent to the Estero Americano (Figure 2 and Attachment B). Provides further description of the area.</p>

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8-3	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Public Access	Biotic Protections	Y	Sonoma County Local Coastal Plan: The Public Access Element draft SCLCP update describes the need to prevent overuse and damage to the coastal environment and that "substantial modifications of the natural environment for a specific activity" should be minimized and avoided if possible in planning recreational facilities.
8-4	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Public Access	Biotic Protections	Y	Estero Americano Watershed Management Plan: Due to sedimentation, siltation, and nutrient pollution, the Estero Americano is listed as an impaired waterbody by the State Water Resources Control Board (SWRCB), which provided funding for the EAWMP. Ten notable gullies in the watershed, including the steep bowl-shaped hillsides encompassing the two western SLT parcels, are identified in the EAWMP as warranting field assessment as a potential "Priority Gully Restoration Site" for potential management activities that could mitigate soil erosion in the area.
8-5	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Public Access	Biotic Protections	Y	Estero Americano State Marine Recreational Management Area: The western portion of the Estero Americano, including the portion adjacent to Public Access Point is within the boundaries of the Estero Americano State Marine Recreational Management Area (SMRMA), which was adopted by the California State Fish and Game Commission in 2010. Marine Managed Areas, such as the SMRMA, were set aside by the Commission primarily to protect or conserve marine life and associated habitats. The boundaries of the SMRMA are depicted in mapping of "Environmentally Sensitive Habitat Areas" in the public review draft SCLCP update (Sonoma County, 2021) (Attachment A).
8-6	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Public Access	Biotic Protections	Y	Waters of the U.S. and Wetlands: The intermittent creek that flows in to the Estero Americano west of the proposed Public Access Point and riparian wetlands adjacent to the creek are also potentially jurisdictional Waters of the U.S.. The downstream section of the tributary in to the Estero Americano and the mudflats and wetlands near the proposed Public Access Point are mapped as environmentally sensitive "Freshwater Herbaceous Wetlands" in the public review draft SCLCP update (Sonoma County, 2021) (Attachment A).
8-7	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Public Access	Biotic Protections	Y	Eelgrass Beds: The Estero Americano is one of a limited number of estuarine habitats along the coast known to support California eelgrass. During surveys in 2010 and 2014, CDFW documented California eelgrass beds in the Estero Americano adjacent to the proposed Public Access Point (Figure 4). The eelgrass beds in the vicinity of proposed Public Access Point "K-2" are also mapped as one of the "Environmentally Sensitive Habitat Areas" in the draft SCLCP update maps (Attachment A) (Sonoma County, 2021).
8-8	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Public Access	Biotic Protections	Y	Resident and Migratory Birds: The SPSCP describes how growing recreational use of beaches, mudflats, and wetlands appears to be causing increased disturbance of roosting and foraging shorebirds. Erosion and sedimentation in wetlands are also identified in the SPSCP as a threat to shorebirds.
8-9	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Public Access	Biotic Protections	Y	Special-Status Species: The proposed Public Access Point is situated in and adjacent to habitats providing suitable habitat for several special-status plant, wildlife, and fish species. California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB, 2021) (Attachment D) contains records of 44 special-status species documented within the USGS 7.5-minute Bodega Head and Valley Ford topographic quadrangles, which is an area encompassing approximately 120+/- square miles surrounding the site. An additional 7 federally listed or candidate wildlife and plants species are identified in the United States Fish and Wildlife Service (USFWS) IPaC Trust Resource Report of Federally Threatened and Endangered species that may occur in or be affected by projects in the project vicinity (Attachment D). Some species mentioned: CA red-legged frog, yellow larkspur, and Myrtle's silverspot butterfly.

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8-10	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Public Access	Biotic Protections	Y	Proposed Public Access Point Activities: Scrambling down the extremely steep hill from the proposed Public Access Point to the water would be treacherous, even without carrying a kayak. Absent development of a dock in the open waters (which would trigger the need from permits from several agencies), any kayakers launching or coming ashore at the proposed Public Access Point would need to wade through expansive mudflats and traverse sensitive wetland habitats situated between the open waters of the Estero Americano and dry land. It is anticipated large groups of kayakers may congregate at the proposed Public Access Point, for picnics or other gatherings that could generate noise impacting both wildlife and nearby residential parcels.
8-11	2/23/22	Prows, Peter/ Moore, Diane	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Public Access	Biotic Protections	Y	Potential Impacts to Biological Resource from Increased Public Access: Because it is a navigable waterway, the Estero Americano is already used to some degree by the public for boating and other recreation, but existing use should be limited to the open water navigable areas. Unless kayakers or other boaters are coming ashore, which would involve trespass, the sensitive mudflats and emergent wetlands at and near the proposed Public Access Point are not subject to human trampling and the species that utilize these habitats are not subject to noise disturbance.
9-1	2/23/22	Prows, Peter	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Public Access	Biotic Protections	Y	A summary of Diane Moore's biological study. The Estero Americano is a remarkable estuary, teeming with protected fish and wetland species, rare birds, endangered plants, and precious eelgrass. The operative LCP, at page III-11, deems the "[m]arsh, riparian and open water areas of Estero Americano from the mouth to Valley Ford" as "Sanctuary-Preservation Areas" and "Rare and/or endangered plant site". The entire Estero Americano is an environmentally sensitive habitat area entitled by the Coastal Act to being "protected" and "enhanced" rather than "disrupted" in "any" way. The draft LCP, however, would significantly change public access to the Estero Americano, likely at the expense of the remarkable natural resources there. The draft LCP, in Figure C-PA-1k, proposes five public access locations (K-1 through K-5) in the Estero Americano area, while the Public Access Plan proposes six public access locations (J-1 through J-6) in that area. There is no public access to K-2/J-2 from the Estero Americano itself. While K-2/J-2 is depicted on a parcel owned by the Sonoma Land Trust, which is subject to an openspace easement, there is no way to get to that point from the Estero Americano without first crossing private property. Ms. Moore's analysis was that public access to K-2/J-2 could cause all manner of harm and potential take to important or protected plant and animal species. The draft LCP update does not acknowledge these impacts or attempt to reconcile them with the Coastal Act policies requiring protection and enhancement of environmental resources, rather than their disruption. K-2/J-2 should be deleted entirely, both because there is no public access to that area and because it is entirely environmentally inappropriate as a public access area to the precious Estero Americano.
9-2	6/1/1977	Prows, Peter	Concerned Citizens for Estero Americano	PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT "K-2"	pprows@briscoela w.net	Land Use	OSCR	Y	An attachment submitted by Peter Prows with a CCC settlement from 11/4/1976.
9-3	2015	Sonoma Land Trust	Sonoma Land Trust	"On the Land"	N/A	Land Use	Public Access	N	Attachment submitted by Peter Prows displaying a Sonoma Land Trust program which includes public outings and membership opportunities.
9-4	4/7/16	Edwards, Shanti	Sonoma Land Trust	Estero Lane/ Coastal Trail	N/A	Land Use	Public Access	N	Peter Prows attachment of a Sonoma Land Trust email correspondence regarding guided outings and Estero neighbor responses to public access at the Estero.
9-5	8/24/18	Dertien, Larson, and Reed	Wildlife Conservation Society	Coastal Trail	N/A	Biotic Protections	Public Access	N	Attachment provided by Peter Prows: A Wildlife Conservation Society report for the Sonoma Land Trust regarding non-consumptive human recreation activity negatively affecting wildlife individuals, populations, and communities on every continent and in every major ecosystem.

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10	5/12/22	Matthes, Janus	Wine & Water Watch Board	Sonoma Coast ESHA	bjmatthes@comcast.net	Land Use	Biotic Protections	Y	Endangered Species Habitat Area (ESHA) zones have been reduced from the original three to only one. Permit Sonoma has not made adequate consultations or studies prior to drafting the LCP. This comment includes suggested text changes for the following sections: agriculture, aquaculture, impacts of climate change, water resources, biotic protections (OSRC, ESHA).
11-1	6/1/22	Lindenberg, Justin	Stewards of the Coast and Redwoods	Russian River Sector of California State Parks	N/A	OSCR	Biotic Protections	Y	There has been increased park visitation since COVID-19, and the Stewards have submitted comments on several sections of the LCP revisions.
11-2	6/1/22	Lindenberg, Justin	Stewards of the Coast and Redwoods	Russian River Sector of California State Parks	N/A	OSCR	Biotic Protections	Y	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: "Harbor Seals, Steller sea lions, and other pinnipeds protected under the and the Marine Mammal Protection Act (MMPA), haul out on 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, Goat Rock Beach in Jenner, and in the intertidal areas of Bodega Bay to rest, give birth, nurse their pups, and molt."
11-3	6/1/22	Lindenberg, Justin	Stewards of the Coast and Redwoods	Russian River Sector of California State Parks	N/A	OSCR	Biotic Protections	Y	Page OSRC-25, Policy C-OSRC-5e(3) and Page OSRC-26, Policy OSRC-5e(5) Comment: The two above-cited policies are intended to protect biological resources (nesting birds on offshore rocks and marine mammals). But there is no mechanism specified for enforcement of the prohibitions against trespass on or disturbance/harassment of these sensitive habitats. Recommendation: Consider a programmatic revise to the public access element of the LCP for county, state, and federal agencies, and local nonprofit partners to develop a coastal development permit through the California Coastal Commission for a seasonal closure of a portion of Goat Rock Beach to protect the harbor seals during pupping season. Currently, State Parks and Stewards of the Coast and Redwoods Seal Watch Volunteers erect ropes and signage as a "symbolic" closure which we seek to have formalized through this programmatic mechanism and supported through agency collaboration.
11-4	6/1/22	Lindenberg, Justin	Stewards of the Coast and Redwoods	Russian River Sector of California State Parks	N/A	OSCR	Biotic Protections	Y	Page OSRC-26, Policy C-OSRC-5e(6): Comment: Annual monitoring is 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 and Sonoma Water 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."
12	6/12/22	Tibbetts, Denny	N/A	N/A	tibbsx4@comcast.net	Land Use	Public Access/Safety	N	Asks that the Commission adheres to the posted schedule, and that questions are answered sequentially. References Laura Morgan's comments regarding the carrying capacity of infrastructure on the coast and encouragement of coastal recreation development and its environmental impacts. Also references Cea Higgins' comments regarding inadequate connections between public safety and facilities. Feels as though Permit Sonoma and the Commission have been moving on to new elements without clarifying the older elements first.
13	6/7/22	Tibbetts, Denny	N/A	Estero Access	tibbsx4@comcast.net	Land Use	Public Access	N	Map marker K2 is not accurately placed or existent. There is no trailhead where one is marked, and there is no public access. One would have to trespass on private property for access. Modification of the map needs to occur to prevent trespassing.