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**Sent:** Wednesday, June 22, 2022 2:36 PM  
**To:** Gary Helfrich <[Gary.Helfrich@sonoma-county.org](mailto:Gary.Helfrich@sonoma-county.org)>  
**Cc:** Rexing, Stephanie@Coastal <[Stephanie.Rexing@coastal.ca.gov](mailto:Stephanie.Rexing@coastal.ca.gov)>; KoppmanNorton, Julia@Coastal <[julia.koppmannorton@coastal.ca.gov](mailto:julia.koppmannorton@coastal.ca.gov)>  
**Subject:** Sonoma LCP Update Planning Commission Comment Letter

**EXTERNAL**

Hi Gary,

Attached is a comment letter for the County in advance of the Planning Commission's virtual public hearing on June 29<sup>th</sup> to review the Public Review Draft of the Sonoma Local Coastal Program. Let me know if you have any questions.

Thanks!

Peter Benham  
North Central Coastal Planner  
California Coastal Commission



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**CALIFORNIA COASTAL COMMISSION**

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June 22, 2022

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

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

Dear Mr. Helfrich:

Thank you for the opportunity to review and comment on the County's draft of the update to the Local Coastal Program (LCP) Land Use Plan (LUP). Please present this letter to the Planning Commission in their consideration of this item that is scheduled to be heard at the June 29, 2022 Planning Commission hearing. As you know, the LUP is a key regulatory tool that implements the statewide goals and policies specified in the California Coastal Act to protect, restore, and enhance coastal resources at the local level, including by specifying the kinds, locations, and intensities of allowed development and applicable coastal resource protection requirements. Once the LUP and an accompanying Implementation Plan (IP) are certified by the Coastal Commission,<sup>1</sup> thus certifying an updated LCP overall, the updated LCP forms the basis and standard of review for future development within the County.

Most recently on July 12, 2021, the County provided an updated draft of the LUP for our review. In response we provided a general comment letter on July 23, 2021 providing a summary of some of the key issues we identified in a first review of the draft document, followed by an extensive review of each element of the draft LUP, with comments provided on the first element in September of 2021, and the last set of comments provided in February of 2022. In this more comprehensive review, we provided line by line edits supplemented by general comment letters which summarized some of the overarching issues identified in each element. Comments were provided for all elements, except for the introduction, including the Land Use, Agricultural Resources, Open Space Resource Conservation, Public Access, Water Resources, Public Safety, Circulation and Transit, Public Facilities and Services, and Cultural Resources Elements. These comments were provided over a 6-month period, and were shared and discussed with County planning staff over that time period, which represents a considerable expenditure of effort and time from both County PRMD and Coastal Commission staff.

On June 2, 2022, County staff began releasing the most recent draft of the LCP Update,

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<sup>1</sup> The standard of review for an LUP is Chapter 3 of the Coastal Act, and for an IP is the certified LUP.

Sonoma County Planning Commission  
Comments on the County's Draft LUP Update  
June 22, 2022

with the final element uploaded on June 13, 2022. Given that the Planning Commission meeting to review this draft is on June 29, 2022, Commission staff will not have adequate time to review this recent draft in depth, to assess how much and to what degree our feedback was incorporated, or to provide new comments, prior to the meeting. However, it is our understanding from communication with County staff that the majority of our in-line comments, as well as our overarching concerns (as outlined in the comment letter provided on July 23<sup>rd</sup>, as well as the individual comment letters provided for each element) have been addressed in the version of the LUP that will be presented to the Planning Commission. While we will not provide new comments prior to the Planning Commission Hearing, it is our intention to fully review the draft LUP as we are able going forward and provide any additional comments where needed in advance of the Board of Supervisors hearing, which is currently scheduled for August 30, 2022.

We want to commend you and your staff for the ongoing collaboration with us and want to recognize the effort invested in the difficult task of updating the LCP's LUP. We look forward to further collaboration reviewing this new draft and if you have any questions or would like to discuss these matters further, please don't hesitate to contact me.

Sincerely,

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