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Sent: Thursday, June 23, 2022 2:43 PM
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Subject: Comments on Draft LCP

EXTERNAL

Dear Planning Commissioners and Permit Sonoma Staff,

I've been reviewing the latest draft elements of the LCP and find little to nothing about the importance of or protecting forests or acknowledgment that we have 513k acres of forests which is half of the county's 1m acres. In fact, in the Water and OSRC Elements the word "trees" is usually used instead of forests. No relationship to forests is mentioned in the Water Element. No mention of soils, water (neither surface nor ground basins) and forest relationships in any element including in Watershed references. No mention of protecting forests from catastrophic wildfires, even in high fire severity zones.

Please accept this email and attachment as my comments on the current Draft LCP. I'd like to receive confirmation that you did receive my comments.

Regards,
Dee Swanhuyser,
Member,
Sonoma County Local Coastal Plan Update Committee

Swanhuyser's Comments (with quotes from the draft LCP in italics for reference to comments)

There's no Natural Resources Element in the LCP draft that I could find? Why?

Why does the LCP Draft use the term "trees" instead of "forests" in some sections? I'm sure sometimes it is appropriate but, in many cases, it is not.

LAND USE ELEMENT:

Include policies, programs, initiatives that reference trees beyond Commercial Timber lands. Forests that are not timberlands exist in the LCP area (don't know acreage).

WATER RESOURCES ELEMENT

My comments: Use the word "forests" instead of "trees". The Vegetation references may include forests but add the word forests along with vegetation in that sentence. No relationship to forests is mentioned in the Water Resources Element. Trees are mentioned but need policies, programs, initiatives includ.

Forests are critical so soils can retain maximum about of water and this fact should be included in the LCP.

"Biotic resources include vegetation, trees and other natural vegetation that depend on water, but their presence also

affects the long-term quality and quantity of water resources in several ways. The natural vegetation found around wetlands, streams, and lakes benefits water quality by filtering out sediment and pollutants from stormwater runoff before it enters surface water bodies. Vegetation can also block stream flows and increase the retention of stormwater, thereby recharging groundwater, absorbing pollutants, and modifying peak flood levels. Vegetation on stream banks reduces bank erosion as a source of sediment. Trees and shrubs provide shade which can lower the temperature of the water and increase its value as fishery habitat in a warm climate. Streamside trees that fall into stream channels may aid fishery habitat by providing shelter, diverting flood flows, and scouring deep holes.

Groundwater Availability

The amount of groundwater in an area varies by the recharge from rainfall, the surface runoff in streams and drainage channels, and the local underground geology. The alluvial soils, sand, and gravel found in valleys generally can hold large amounts of water and thus constitute the largest aquifers in the County. Sandstone and some other sedimentary rocks can still absorb some water.

The climate of coastal Sonoma County provides abundant rainfall during the winter months, and potentially abundant groundwater recharge on an annual basis. This pattern of reliable groundwater recharge will be influenced by climate change and groundwater resources will likely be less predictable and more limited in the future.

Most of the County's groundwater basins are centered along major creek and river valleys. However, many upland areas and the Coastal Zone are comprised of harder Franciscan rock formations that lack water storage capacity that underlie the area. The Franciscan Formation is a large area of mixed sedimentary, metamorphic, and igneous rocks. Groundwater is stored in the fractures, joints, cavities, and bedding planes of the rocks. The Franciscan Complex is generally considered to be non-water bearing; water availability largely depends on the nature of the fractures and their interconnection. The location of water-bearing bedrock is difficult to predict, so water availability is uncertain. Rainfall that would otherwise percolate into the aquifer simply runs off into creeks and streams and then to the ocean for lack of storage space in most of the rocks. Groundwater in these areas will become increasingly brackish as salt water intrusion increases with sea level rise. This increase will be exacerbated by increased groundwater extraction, creating exceptional challenges to sustainably increasing the capacity of existing water systems."

OPEN SPACE RESOURCE CONSERVATION ELEMENT

8. Environmentally Sensitive Habitat Areas

Goal, Objectives and Policies

The goal below is great but there are no Objectives or Policies that specifically support forests except for timber lands (there are 6 objectives for timber lands)

GOAL C-OSRC-8: Protect and enhance the native habitats and diverse ecological communities on the Sonoma County Coast.

Objective C-OSRC-8.1: Designate Environmentally Sensitive Habitat Areas and update designations every five years, or sooner if significant new information is available, using credible data sources, improvements in identifying ESHA, scientific discovery, and regulatory changes including decisions and guidance from the California Coastal Commission. (CCC REVISED)

Policy C-OSRC-8a: Mapping shown in Figures C-OSRC-2a through 2k is not a comprehensive inventory of all ESHA due to changing habitats, future improvements in identifying ESHA, regulatory changes, and scientific discovery. In addition to mapped areas, the following areas shall be considered ESHA, unless there is compelling site-specific evidence to the contrary. (CCC REVISED)

My comment: most forests should be OSHA designated, not only Old Growth, but they're not mentioned.

- (1) Any habitat area that is rare or especially valuable from a local, regional, or statewide perspective.
- (2) Areas that contribute to the viability of plant or animal species designated as rare, threatened, or endangered under State or Federal law.
- (3) Areas that contribute to the viability of species designated as Fully Protected or Species of Special Concern under State law or regulations.

(4) Areas that contribute to the viability of plant and animal species for which there is compelling evidence of rarity, or a species or habitat that is considered to have a special role in the ecosystem. (CCC REVISED NEW)

(5) Old growth Redwood and Douglas fir trees and associated forest habitat. Because of their rarity and biological importance, isolated old growth Redwood and Douglas fir trees shall be protected as well as intact old growth forest habitat. (GP2020 REVISED)

My comments on OSHA designations: If forests are not considered OSHA areas, the LCP needs to make a statement that they need to become OSHA areas for all the reasons the other land use types are OSHA areas. Below are the criteria, many which are appropriate to forests and I have bolded them.

Policy C-OSRC-8b: *The following criteria shall be considered when determining whether an area should be designated ESHA:*

(1) The potential ESHAs presented on Figures C-OSRC-2a through 2k

(2) Federally-listed Rare, Threatened, & Endangered Species

(3) State-listed Rare, Threatened & Endangered Species

(4) Federal and State Proposed/Candidate Species

(5) California Native Plant Society “1B” and “2” Listed Species

(6) *California Department of Fish and Wildlife Global and State 1 - 3 Ranked Vegetation Communities (i.e. G1, G2, G3, S1, S2, S3)*

(7) *California Department of Fish and Wildlife Global and State 1 - 3 Ranked Plant and Animal Species*

(8) ***California Species of Special Concern***

(9) ***California Fully Protected Species***

(10) ***Habitats that Support Listed Species (i.e., those in 2, 3)***

(11) ***Tree stands that support raptor nesting or monarch populations***

(12) *Genetically special populations (NEW)*

10. Soil Resources

My comments: Need to include forest soils beyond only timber lands

Soil resources policy is to maintain soil productivity and prevent lands with productive soils from converting to non-resource uses, and to promote soil management and conservation practices that will maintain productivity of those lands.

Important farmland soils on the Sonoma County coast include grassland suitable for sheep and cattle grazing along the coastal terrace and lower slopes on the North Coast and throughout the County coast south of Jenner. Soil, climate, topography, and water combine to make these lands highly

productive agricultural areas. Important timberland soils on the County coast are located primarily north of Russian Gulch and in the Willow Creek watershed.

Goal, Objectives, and Policies

GOAL C-OSRC-10: Encourage the conservation of soil resources to protect their long-term productivity and economic value through soil conservation and management practices that maintain the productivity of soil resources.

11. Timber Resources

GOAL C-OSRC-11: Preserve, sustain, and restore forestry resources for their economic, conservation, recreation, and open space values.

Programs – My comments: The program below should be supported. There should be other programs that go beyond the one as clearly Goal C-OSRC-11 lays out in that it uses the term “forestry” and not “timber land.” However, assuming the LCP uses the word “forestry” only in reference to timber lands in this section, “Forests” in general should be added as a program somewhere in the LCP with using “*develop forestry guidelines including best practices to improve habitat health and reduce the risk of wildland fire*” text as used in Program C-OSRC-11-P1.

Program C-OSRC-11-P1: In cooperation with the Coastal Commission, State Parks, and Cal Fire Board of Forestry, develop forestry guidelines including best practices to improve habitat health and reduce the risk of wildland fire without restricting public access to the coast. Establish a coastal permit

exemption, other exemption process, or master plan for forestry maintenance activities consistent with such guidelines. (NEW)

Initiatives

My comment: Below initiative should include forest protections beyond trees or grove.

Initiative C-OSRC-8-I2: Encourage landowners to voluntarily participate in a program that protects officially designated individual trees or groves that either have historical interest or significance or have outstanding size, age, rarity, shape or location. (GP 2020)

LCP MAPS

My comments: No mention of the key role of forests or forest designations of any forest lands (only timber lands are designated):

Map - Role of Natural Habitat of Reducing Exposure - no reference of forests importance

Map - Land Use - designates So.Coast SP (partial), Stillwater Cove and Ft Ross SHP, lands surrounding Duncans Mills on both sides of the river as timberlands on one map while designating So.Coast (also partial) as public facilities on another

Map - OSHA - designations for oak and riparian woodlands exist but seem to me to be small specks that need to be bigger if these OSHA areas are really going to be protected and thrive.

APPENDICES

E- Natural Resources

My comment: Really? No mention of forests or trees?

I – Categorical Exclusions

My comment: Section 30243 should include reference to the importance of forests for retention of groundwater. It should use the word “forests” for “trees”.

“Section 30243 of the Coastal Act provides that the long-term productivity of soils shall be protected. Trees provide a natural means of controlling soil erosion by acting as windbreaks and soil stabilizers. The Exclusion provides that the Director of the Permit and Resource Management Department must certify that any proposed activity protects trees which are important in the control of erosion and in the provision of windbreaks. The Commission finds that, as conditioned, this Exclusion will assure the long-term productivity of soils and will not contribute to soil erosion.”