

## Comment and Question for Lynda Hopkins from Save the Sonoma Coast, re: Sonoma County Local Coastal Plan Update Draft, 1/21/20 meeting

We first wish to express our gratitude to Supervisor Hopkins for her dedication to Sonoma County, its people and environment, and particularly to the coastal zone.

Despite its length, we hope she has had an opportunity to read the Local Coastal Plan Update Revision for 2020.

After months of close reading and attempted analysis of the current LCP revised draft, in addition to attending all the public workshops on the subject held thus far, our group of approximately 50 Sonoma County coastal advocates has come to the conclusion that it is not reasonable to expect the average citizen to be able to read the revision comprehendingly and give meaningful comment.

The document is vague, self-contradictory, and so poorly organized that it does not serve as a viable basis for public contribution to the Local Coastal Plan. We strongly recommend that it be re-written.

More specifically, we find the Objectives, Goals and Policies:

- unclear in their own definitions;
- lacking in clarity with regard to how they interrelate;
- inaccessible for easy linkage to equivalent language and policies in the previous LCP (there is no clear way to track interim changes);
- ill-defined in their relationship to future zoning policy;
- confusing with regard to their relationship to Principally Permitted Uses, and how both Policy and PPU's are determined and prioritized;
- untraceable with regard to their relationship to the Administrative Manual.

Principally Permitted Uses, in turn, are inaccessible in their implications for average citizens wishing to comment, due to the fact that they are:

- not reasonably defined;
- lack specific, stated connection to implications for future project permit approvals;
- do not clearly explain what kind of future projects in the PPU category will be appealable to the Coastal Commission, and why or why not.

In addition to these draft deficiencies, we note that:

- The Glossary and Table of Contents are inadequate and incomplete.
- There are numerous exhibits and charts referenced that are not present in the draft.
- The appendices are not introduced nor is it explained how they are connected to the Elements.
- The draft requires constant cross-reference to different sections of itself.
- The maps in the draft are fragmented, out-dated, confusing and inaccurate.

In other words, this is not a “primary document” which can be read through in logical sequence and understood by the average citizen.

In addition, inappropriate overlay of the General Plan 2020 in the document is in contradiction to the mandates of the California Coastal Act and will not be acceptable for approval by the California Coastal Commission.

These issues are mentioned apart from the inherent conflict of interest in allowing Permit Sonoma to write and administer the LCP, combined with the extraordinary degree of discretion delegated to Permit Sonoma staff by omission of language that is specific and enforceable with regard to future development.

There is also a striking lack of modern scientific information in the draft. There are no science-based specific recommendations for best forestry practices, optimal coastal land management, catchment or recharge of already scarce water, avoidance of siltation in the Gualala or Russian River watersheds (as well as the smaller ocean-draining creeks), pesticide application in the coastal zone, wildlife habitat or corridors, or carbon sequestration resources in the face of the climate emergency we now face.

Additionally, there is no specific addressing of the imbalance of vacation rentals (53% of existing coastal zone housing) vs affordable housing policy, except to imply the need for further construction; no road or other infrastructure policy; no firm policy to cover the unique emergency service and law enforcement needs already lacking for the coastal zone population that swells by orders of magnitude with seasonal tourism, nor any enforcement provisions. These critical omissions, combined with the points above, render the draft unsuitable for meaningful public comment as mandated by the California Coastal Act. These themes of deficiency have been repeated by unrelated concerned citizens at every LCP Update workshop held thus far.

- Will you advocate for an LCP re-write in which local communities, long-established local nonprofits, local coastal advocates, all coastal governance entities and eminent local scientific bodies formally cooperate to create a meaningful and publicly-accessible draft?

Best wishes and thank you for your consideration,

Representatives of Save the Sonoma Coast:

Richard Retecki, author of the first Sonoma County Local Coastal Plan  
Cea Higgins, Executive Director Coastwalk California  
Laura Morgan, MD, Occidental Area Health Center