

4. Wetland buffer zone requirements
 5. Permitted uses within wetland buffer zones
 6. Development standards in wetlands and wetland buffer zones
 7. Wetland condition
 8. Wetland protection
 9. Any other policies pertaining to wetlands
2. **Policy Content in Appendix E.** Generally, the appendix should contain supplemental information rather than actionable policy language. Much of the content of Appendix E: “Natural Resources” should be included in the body of the LUP as policies specific to each habitat type as explained in the previous comment. This includes guidance contained in E-2, “Biological Resource Assessment”; E-3 “Criteria for Establishing Buffer Areas”; E-4 “Technical Criteria for Identifying and Mapping Wetlands and Other Wet Environmentally Sensitive Habitat Areas”; and E-5 “Habitat Protection Guidelines”.
3. **ESHA and Wetland Definitions.** This chapter should include a definition of ESHA consistent with Coastal Act §30107.5 as well as a definition of wetland consistent with Coastal Act §30121 and §13577(b) of the Code of Regulations. In addition, the description of wetlands should explicitly state that the LCP, consistent with the Coastal Act, adheres to the single parameter wetland delineations, and should spell out the three wetland indicators (hydrophytic vegetation, hydric soils, and/or saturated substrate).
4. **Mitigation and Restoration Policies.** The LUP should contain specific mitigation and restoration policies for any permitted impacts to ESHA, wetlands, and riparian habitat areas. While some of this language is included in Appendix E-5, as stated previously, these should be incorporated as policies in the body of the chapter. Beyond incorporating language from the appendix into the chapter’s policies, the LUP needs to include a policy that establishes required mitigation ratios for each habitat type. The Commission’s standard mitigation ratios are as follows:
- 10:1 for native tree replacement;
 - 4:1 for wetlands;
 - 3:1 for riparian habitats;
 - 3:1 for other habitats that support state or federal rare, threatened, or endangered species, species of special concern, or CNPS 1b or 2 listed plants;
 - 2:1 for coastal sage scrub not occupied by listed species; and
 - 1:1 for temporary impacts on any of the above habitat types.
5. **Applicable Coastal Act Policies.** This chapter should reference the relevant Coastal Act policies in their entirety, including Coastal Act Sections 30230, 30231, 30233, 30236, and 30240.

6. **Policies Removed from Previous Versions.** Since the last time Commission staff reviewed the draft LUP, some important policies and objectives have been omitted. The County should consider adding these policies and objectives back in as they provide significant coastal resource protections grounded in Coastal Act consistency. These are indicated in the in-line edits and listed here, below:

Objective C-OSRC-6.6: Establish standards and programs to protect native trees and plant communities.

Objective C-OSRC-6.7: Support the use of native plant species and the removal of invasive exotic plant species.

Objective C-OSRC-6.8: Encourage voluntary efforts to restore and enhance biotic habitat.

Objective C-OSRC-6.9: Preserve and restore major wetlands (including marshes).

Objective C-OSRC-6.10: Promote production of native marine and shoreline plant and animal habitats.

Objective C-OSRC-6.11: Designate all streams shown on maps created by USGS in the National Hydrography dataset as Riparian Corridors, and establish streamside conservation areas along these designated corridors.

Policy C-OSRC-8h: Carry out the following activities to preserve Chinook and Coho Salmon Habitat (Anadromous Fish Streams):

- 1. In an Anadromous Fish Stream, maintain flow levels 1.5 times the minimum necessary for use of the stream as an anadromous fish spawning area.*
- 2. All stream diversions shall be stopped when the streamflow in an Anadromous Fish Stream falls below the minimum flow standard and until the streamflow returns to levels above the minimum flow standard.*
- 3. Allow and encourage maintenance of summer base flow in an Anadromous Fish Stream to ensure the survival of fish in all life cycle phases.*

Policy C-OSRC-XX: Work with the Sonoma County Water Agency and other entities to identify all streams with “bed-and-bank” channels and consider Riparian Corridor designation for all such streams.

Program C-OSRC-8o: Continue to actively participate in the FishNet4C program and work cooperatively with participating agencies to implement recommendations to improve and restore aquatic habitat for listed anadromous fish species and other fishery resources. (GP2020)

Program C-OSRC-8p: In coordination with resource agencies, landowners, and the affected public, regularly review Riparian Corridor designations; ephemeral drainage; the requests, approvals, and required mitigation for setback reductions; any cumulative effect of the approved reductions; and other protection issues and, if warranted,

develop recommendations for County policies that may be needed to ensure appropriate protection of Riparian Corridors. (GP2020)

Program C-OSRC-8q: In coordination with resource agencies, landowners, and the affected public, conduct a comprehensive study of Riparian Corridors in grazing areas and, if warranted, develop recommendations for County policies that may be needed to ensure appropriate protection of such corridors. The study should consider the need for policies directing the development of livestock watering areas away from Riparian Corridors and the use of special range management practices, including fencing, which protects Riparian Corridors. (GP2020 Revised) (Existing LCP Revised: Recommendations 14-15 on page 29 and Recommendation 15 on page 55)

7. **Additional Recommended Policies.** Per Commission guidance on LCP updates for natural resource chapters, we have identified a series of policies we recommend incorporating, including:

- A policy that 1) establishes how policies are to be applied in situations with more than one habitat type and 2) states that ESHA policies apply to all categories of ESHA, except where modified by more habitat-specific policies;
- Measures to address landscaping and vegetation clearance for fire protection purposes to avoid and minimize impacts to ESHA;
- Mitigation measures for any resource-dependent or other allowed uses in ESHA, including mitigation ratios for unavoidable loss of ESHAs;
- Provisions addressing climate change and sea level rise effects on ESHA;
- Measures to address beach grooming, consistent with the protection of sensitive species (e.g., grunion and western snowy plover);
- Tree trimming and removal policies including to ensure the protection of bird nesting habitat protected by the Migratory Bird Treaty Act and the long-term protection of breeding, roosting, and nesting habitat of state and federally listed bird species, California bird species of special concern, and bird species that play an especially valuable role in the ecosystem
- Requiring that construction projects located in close proximity to habitats that support sensitive birds or other sensitive wildlife species follow noise impact precautions.

Again, we thank you for your efforts to date on the LUP update, and we look forward to continued coordination to this end.

Sincerely,

Peter Benham

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