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Sent: Saturday, January 29, 2022 11:51 AM
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Subject: LCP Update: Expansion Limitation of Timber Cove Inn

EXTERNAL

Hello Planning Commissioners,

Please find attached a request for changes to the draft LCP regarding Timber Cove and Timber Cove Inn.

Unfortunately the opportunity did not arise at the last Planning Commission hearing on Land Use for me to raise my request verbally, and I am unable to attend the upcoming February 3 hearing because of prior commitments.

I hope that you can consider this request as part of this significant work you are doing not just for the Timber Cove community, but all coastal communities and the land that we all steward.

Of course, feel free to contact me further if you have any questions.

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Sonoma County LCP Update

Land Use Element: Visitor Serving Commercial Facilities

Timber Cove Inn

Request

Remove the following policy from the LCP Update:

***“Policy C-LU-6I: Limit expansion at the Timber Cove Inn to improved parking and public access facilities.”
(Page LU-23).***

Include Timber Cove in the following objective from the LCP Update:

“Objective C-LU-2.3: Designate Bodega Bay as the major retail and service center for the coast. Permit limited opportunities for new commercial activities in the communities of the Sea Ranch, Duncans Mills, Jenner, and Stewarts Point, in keeping with their size and character.” (Page LU-24).

Reference to Timber Cove Inn in Local Coastal Plans

Coastal Plan Recreation and Visitor Serving Facilities Draft April 1980

In this document, Timber Cove is described as:

“the largest overnight facility between The Sea Ranch Lodge and Bodega Bay, and includes a major restaurant and bar. Management problems and changes in ownership have prevented the inn from maintaining its reputation for high quality, as remarked by some citizens in the survey. It is recommended that there be no expansion of use here, except improved parking facilities. A public accessway with parking is recommended in the access plan.” (page 13).

Local Coastal Plan (Current) Land Use V: Recreation and Visitor Serving Facilities

The existing LCP refers to Timber Cove Inn under the Development Areas and Needed Facilities of the Land Use Element. Timber Cove Inn is described as:

“the largest overnight facility between The Sea Ranch Lodge and Bodega Bay, and includes a major restaurant and bar. Except for improved parking facilities, the potential for expansion is limited.” (page 112).

Specific Recommendation 14 (page 114) states:

“Limit expansion at the Timber Cove Inn to improved parking facilities and coastal access.”

Draft LCP (June 2021) – Land Use Element

The draft LCP refers to Timber Cove Inn as follows:

“Policy C-LU-6I: Limit expansion at the Timber Cove Inn to improved parking and public access facilities.” (page LU-23).

Timber Cove and the Draft LCP (June 2021)

The draft LCP states the following intention for the Land Use Element of the plan:

“provides the framework for land use that serves to protect the Coastal Zone’s abundant natural resources and provide for enhanced public access and recreation that serves the greater community, while balancing the needs of local residents, farmers and resource managers.” (Page LU-3).

Timber Cove Resort currently exists on a parcel of land zoned CT CC – Commercial Tourist, Coastal Zone. Section 3.3 of the draft refers to Visitor-Serving Commercial Facilities, and within this a variety of goals, objectives and policies have been laid out to encourage public access and visitor serving uses in the Coastal Zone (page LU-22).

Rural Community

Timber Cove is designated a Rural Community per the existing LCP (Lane Use Sec 7, p195) as well as the draft LCP (Policy C-LU-2j) which states:

“Designate the following areas as Rural Communities (listed from north to south):

- *Stewarts Point;*
- *Timber Cove and Timber Cove Resort, including developed areas adjacent to the subdivision south to and including the Fort Ross Store ...”*

Despite Timber Cove rural community having a commercial visitor serving property with the largest number of beds between Bodega Bay and Gualala, as well as a second smaller hotel and general store at Fort Ross and a campground and RV park, Timber Cove is **excluded** from Objective C-LU-2.3:

“Designate Bodega Bay as the major retail and service center for the coast. Permit limited opportunities for new commercial activities in the communities of Sea Ranch, Duncans Mills, Jenner, and Stewarts Point, in keeping with their size and character.” (Page LU-24).

Goals, Objectives and Policies

Supporting the intention of the Land Use Element of the draft LCP above, a tiered system of goals, objectives and subsequent policies are developed. Relating to Visitor Serving Commercial Facilities, the following have been developed to **encourage public access and visitor serving uses** (Page LU-22).

Goal C-LU-6: Encourage Public Access and visitor serving uses in the Coastal Zone

Goal C-LU-6.1: Establish adequate commercial services for visitors on the Sonoma County coast where such development can be accommodated with minimal impacts on views and natural resources.

Objective C-LU-6.1: Identify and develop new or expand existing commercial services for visitors in urban service area and rural communities.

Encouraging Visitor-Serving Development

Under the heading of Encouraging Visitor-Serving Development, a total of 16 policies have been developed (Policy C-LU-6d through Policy C-LU-6s) (pages LU-22 and LU-23).

Of these 16 policies, 14 policies allow or encourage development, provision, expansion or adaptive reuse of land, historic buildings or operations, supporting the goals and objectives outlined. However, two policies **limit** either expansion or development – in direct opposition to the goals and objectives stated.

They are:

“Policy C-LU-6i: Limit development west of State Highway 1 at Ocean Cove Resort to a day use area and campground. Any development proposals should include provisions for pedestrian safety on State Highway 1, erosion control measures, rehabilitating the graded bluffs at the cove, and if needed, the provision of parking for development consistent with Policy LU-6h.” (page LU-23).

“Policy C-LU-6l: Limit expansion at the Timber Cove Inn to improved parking and public access facilities.” (page LU-23).

The following policy applies to a neighboring area of the same Timber Cove Rural Community where expansion of Timber Cove Inn is limited:

“Policy C-LU-6n: Allow limited or new expansion of existing visitor or local-serving commercial uses, in the vicinity of the Fort Ross Store, subject to design controls reviews to preserve the area’s scenic character.” (page LU-23).

Limitation of Expansion of Timber Cove Inn

It appears from the Coastal Plan, Draft 1980, that the reason behind the expansion limitation of the Timber Cove Inn was that ‘some citizens’ felt that ‘management problems and changes in ownership have prevented the inn from maintaining its reputation for high quality’. This shows that a land use recommendation in the LCP is based solely on the perception held by a few members of the general public. Furthermore, this subjective opinion of TCI management and ownership practices or the reputation of the business, have no relevance to land use.

It also appears that the expansion limitation on Timber Cove Inn has remained essentially unchanged (with the exception of removing the reasoning for the determination) within the LCP, through to the latest draft of the LCP. Subsequent versions of the LCP do not appear to show any updated review of public opinion of the inn, consideration of the impact of changes in ownership and management since 1980, or that the original determination is inappropriate.

Summary

We request that Policy C-LU-6l be removed from the draft LCP on the following basis:

- Initial justification for inclusion in April 1980 draft LCP, upon which the current policy was based, is no longer applicable. No explanation for continuation of the policy has been given in any subsequent LCP, including the latest draft LCP update;
- The policy is directed against a private operation, not land use and based on limited public feedback;
- In limiting development of a legitimate visitor-serving commercial facility, it is in opposition, not support, for the relevant goals and objectives of the LCP to encourage visitor serving development, under which the policy is listed;
- It arbitrarily limits development of one commercial tourist property whilst supporting the development of another property within the same Rural Community;

We request that Timber Cove Rural Community be included in Objective C-LU-2.3 of the draft LCP on the following basis:

- Timber Cove contains:
 - Residential sub-division;
 - Largest employer between Bodega Bay and Gualala;
 - Multiple recreation and lodging opportunities;
- As such, is no less significant than the other communities listed in the Objective.