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

**Subject: County of Sonoma Draft Local Coastal Program Land Use Plan Update:
Circulation and Transit Chapter**

Dear Mr. Helfrich:

Thank you for the opportunity to review and comment on the County's proposed update to the Local Coastal Program (LCP) Land Use Plan (LUP). We want to thank the staff involved in this update for their hard work, and for coordinating with us during this process. In our experience, this type of early coordination helps to ensure a smoother LCP certification process, including streamlining review and resolution of issues upon submittal to the Coastal Commission. The comments and recommendations below summarize the overarching feedback on Chapter 8: Circulation and Transit.

The list below is intended as a complement to the in-line edits and comments provided for the Circulation and Transit element but is not exhaustive of every comment and edit included. Therefore, edits and comments in the chapter itself should be treated as the primary source of feedback, with this letter serving as guidance containing some of the major themes of our recommendations. We anticipate discussing these issues in more detail during staff-to-staff coordination meetings with Sonoma County staff:

1. **Sea Level Rise and Adaptation Planning.** Overall, this chapter should contain more discussion of associated sea-level rise (SLR) issues and adaptation planning, including with regards to the potential impacts of SLR-induced erosion and flooding on circulation and transit in the County, in particular the specific sections, as follows:
 - a. 1.1 "Purpose" should note the need to create resilient transportation infrastructure in the face of SLR;
 - b. "Roadway Safety, Maintenance, and Existing Conditions" (Page CT-3) should include a discussion of not just managed retreat, but also the potential for softer SLR adaptation such as living shorelines or roadway elevation;
 - c. "Transportation Improvements" (Page CT-4) should mention SLR adaptation; and
 - d. "Roadway Safety Improvements" (Page CT-15) should include policies on SLR adaptation.

2. **Highway Realignment.** Related to Sea Level Rise Adaptation, this chapter should include a policy and/or objective to identify sections of roadway that may be candidates for highway realignment given anticipated coastal erosion, similar to the Gleason’s Beach project.
3. **Clean Transportation Infrastructure.** There is a real need for clean transportation infrastructure that will support coastal access and transportation in Sonoma County given the greater distances traveled when compared to other counties and rural characters, however, the chapter does not reference this need to encourage clean transportation or non-GHG emissions vehicles. We recommend incorporating this into Objective C-CT-1.3 as another way of minimizing future increases in vehicle miles traveled to reduce greenhouse gas emissions. For example, the State now has model policies to support the installation of EV charging and Santa Cruz County incorporated an example into their [LCP](#) as well.
4. **Inclusion of Relevant Coastal Act Policies.** As stated in our review of previous chapters, there should be a discussion at the beginning of this element that provides an overview of the relevant Coastal Act Policies. Within the LUP policies, Coastal Act policies should be referenced when appropriate.
5. **Safety Improvements.** Several policies in the “Roadway Safety Improvements” section, including C-CT-4h, 4i, and 4p, mention “safety improvements” but do not define what these improvements might be. To ensure Coastal Act consistency with these improvements, this section should either contain a discussion defining what safety improvements are, or provide policy-specific guidelines on safety improvements such as in C-CT-4q. We would also recommend incorporating SLR adaptation as an element of these safety improvements.
6. **Caltrans Repair and Maintenance Guidelines.** To ensure the LCP aligns with Caltrans guidance on repair and maintenance, we would recommend incorporating the “Sonoma State Route 1 Repair Guidelines” as a policy or appendix in this LCP.
7. **Tools, Standards, and Guidelines.** Numerous tools, industry standards, and measures are referenced in this document, such as the “Traffic Demand Management” measures (Objective C-CT-2.4), Class II bikeway width, geometric, and maintenance standards, and “Vision Zero Principles” (Objective CT-3.4). Additional details on the source and content of these standards should be included in the LCP to allow readers to easily find the referenced information.

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

Sincerely,

Peter Benham

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