

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
1	07/24/2021	Higgins, Cea	Coastwalk California Coastal Trail Association	Agriculture 12.5	Biotic Protections	<i>Review and Clarify Aquaculture Section</i> : Clarify ecosystem impacts (pollution, non-native species introduction, disease between native/non-native species) of aquaculture, limit aquaculture locations, be consistent with state permitting guidelines, and include provisions to reduce env. impact. Re-emphasizing the aquaculture section review. Including a link to the Ocean Protection Council's "Guiding Principles for Sustainable Marine Aquaculture in California" to be used for LCP modifications. Cea Higgins would like the language to be more "comprehensive, science-based, considerate of env. impacts, and consistent w/ state and federal aquaculture policies".	Recommendations will be considered as implementation policy in the Coastal Zoning Ordinance and Coastal Administrative Manual.
2	7/25/21	Dyer, Dawnine	N/A	Land Use	Vacation Rentals	PRO vacation rental restrictions @ The Sea Ranch: review # of days and distance between rental units. There is sufficient nuisance control, but it should be at a neighborhood level rather than county level.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
3	7/24/21	Epstein, Deborah	N/A	Land Use	Vacation Rentals	Against restrictions @ The Sea Ranch. States that a majority of renters are families enjoying the coast, as opposed to party hosts. The Sea Ranch provides families with a nice place to stay while in Sonoma County and brings good tax revenue for SoCo.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
4	7/23/21	Grahame, Margaret	N/A	Land Use	Housing	Insufficient communication and involvement with the community while drafting LCP. There is not enough meaningful data and some aspects of the plan will not be helpful for the community (see: Policy C-LU5d, pg PF-11, and applications of GP policies). Lack of understanding real issues like Coastal Permit Process for Fire Abatement and Employee Housing. Basing business knowledge on 1980s data rather than community. Policy C-LU-6h through C-LU-6n need to be revisited with more community input. Public access points need to be discussed with private landowners. Finds 100 ft minimum setback with the addition of expert analysis could determine vacant parcels as undevelopable. Lists some data/word errors found in Table C-LU-1, inconsistent policies Page OSRC-4, and Table C-PF-1 does not make sense.	Comments noted. There have been 9 Planning Commission Hearings over a 1 year period since the Public Review Draft LCP was published in June 2021.
5	7/25/21	Hansell, Mary	N/A	Land Use	Vacation Rentals	Bought a property June 1, 2021 with intention of short term renting as means of financial income. Opposed to the restrictions.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
6	7/25/21	Hoffman, Bryce	104 Anchorage Close	Land Use	Vacation Rentals	Pro restrictions due to heavy traffic in and out of rental homes in their neighborhood. Expressed concern related to homeowners voting in favor of themselves while not even living in the neighborhood to experience the noise and disruption.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

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7	7/24/21	Moorad, Caroline/Jacquelyn		Land Use	Vacation Rentals	Anti restrictions due to loss of diversity within the community that is brought forth by short term rentals.	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
8	7/24/21	Kazi, Shaheen	N/A	Land Use	Vacation Rentals	Used to short term rent until they bought their own property. They fixed up their property for renting purposes and are dismayed that the restrictions will hurt all parties involved (renters, renters, economy, overall community). Believes that everyone (specifically those who can't afford to buy their own home) should have access to the Sonoma Coast.	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
9	7/26/21	Krupnick, Wendy	Community Alliance with Family Farmers	Land Use	Agriculture	Draft negates value of production on smaller parcels. Policy C-AR-5c needs to address availability of long term water supply. Policy C-AR-6a needs to be monitored to assure homes are occupied by farmers.	Agricultural support services require a coastal development permit, and studies would need to find that the proposed development did not have an adverse impact on coastal resources.
10	7/25/21	Nakazawa, Glenn	N/A	Land Use	Vacation Rentals	Owns a home at TSR, has been renting out home since the 90s. Opposes restrictions but agrees with TSRHC in regards to performance standards and tax revenue. County of Sonoma should not restrict short term rentals.	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
11	7/25/21	O'Neil, Tom	N/A	Land Use	Vacation Rentals	Feel that the voices of The Sea Ranch were not heard and that the process is being rushed. Restrictions will harm income for renters and negatively impact the local economy.	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
12	7/25/21	Rhett, Don	N/A	Land Use	Vacation Rentals	Support The Sea Ranch Hosting Coalition views, oppose TSRA "Model Rule 6.7".	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
13	7/25/21	Ross, David	N/A	Land Use	Vacation Rentals	Support The Sea Ranch Coalition Statement. Enjoyed their short term rental experience over the last 20 years, and now own a home. They do not rent right now, but may wish to do so when they are older for financial reasons.	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

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14	7/24/21	Saiz, Francisco	N/A	Land Use	Vacation Rentals	Own and rent out a The Sea Ranch home, are against restrictions. They believe that it will limit access to the coast for travelers/people who need to get away	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
15	7/25/21	Spain, Kyle	N/A	Land Use	Vacation Rentals	Opposed to restrictions. Believes that the restrictions are being put into place with no prior studies or consultations, and that ultimately, restrictions will create more problems than they will solve.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
16	7/25/21	Staten, Eric	N/A	Land Use	Vacation Rentals	Opposed to restrictions. He is unhappy and feels that the way in which the restrictions are trying to be implemented is backhanded and requires more community input. He and his husband rely on rental income, and have not received any complaints from neighbors.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
17	7/25/21	Styne, Dennis	N/A	Land Use	Vacation Rentals	STR helped them enjoy the coast while dealing with financial hardship and now that they own a cabin there, they want to be able to provide the same experience to people who were in their situation.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
18	7/25/21	Teismann, Lynne	N/A	Land Use	Vacation Rentals	Feels that there hasn't been enough data collected prior to coming up with restrictions and that further data needs to be collected to get a more well rounded community opinion.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
19	7/26/21	The Sea Ranch Hosting Coalition	The Sea Ranch Hosting Coalition	Land Use	Vacation Rentals	Supports reasonable performance standards but is against restrictions on whether and when an owner can rent their property. Feels that not enough data was collected and that these restrictions are an exaggerated response to a small problem.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
20	7/25/21	Walden, Amantha	N/A	Land Use	Vacation Rentals	County should not be in charge of short term rental performance standards or restrictions. Opposes restrictions.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

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21	7/24/21	Weiss, Eugene	N/A	Land Use	Vacation Rentals	Opposes restrictions. Feels as though the restrictions were proposed without valid community input and that more time should be allowed.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
22	7/25/21	Zetzer, Susan	N/A	Land Use	Vacation Rentals	In support of reasonable performance standards and public access. OPPOSED to the new restrictions.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
24	7/17/21	Allebach, Fred	N/A	Public Access	Public Access	Policy C-PA-3g: Low camping costs should be more accessible-- too many reservations made in advance and people can't do same day camping. Policy C-PA-4d: No fees for parking/coastal access.	Comment noted. P parking at public ac
25	7/18/21	Allebach, Fred	N/A	Public Access	Public Access	Free parking, lowered camping cost, bus access to coastal destination. Limit vehicles on beach except for emergencies. Free fire evacuation camping areas. No drones, more wildlife protection, take out pampas grass, guard rail on road to Bodega Head, Improve Gualala campground signs	Comment noted. Proposed policies address concerns regarding cost of camping.
26	7/16/21	Burr, Kimberly	N/A	Open Space and Resource Conservation	Biotic Protections	ESHA designations are too limited and small for the habitat needs of plants and animal species.	Policy C-OSRC-8a requires site-specific evaluation for ESHA within the entire coastal zone.
27	6/23/21	Pettis, Kelsey	N/A	Transportation	Transportation	Wants to know if there will be a separate vulnerability assessment completed for Bodega Bay in relation to the SR 1 North Transportation Concept Report.	Caltrans will be per assessments of all
28	7/2/21	N/A	Sonoma County Coalition of Hosts	Land Use	Vacation Rentals	Small number of places to stay along the coast, and VR (specifically mom & pop) provides more space as well as positively impacts the local economy while also keeping themselves in a financially stable situation. Expresses concern for those who need to rent their homes out to make ends meet.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
29	7/19/21	Coletto, Lance	N/A	Land Use	Vacation Rentals	Please allow people to rent out their homes to folks who otherwise cannot afford to live there.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
30	7/19/21	Greenhalgh, Pamela	N/A	Land Use	Vacation Rentals	County should not enforce TSRA's Rule 6.7. Not based on the community members and adequate data and studies are not present.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

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31	7/16/21	Ho, Eileen	The Sea Ranch Hosting Coalition	Land Use	Vacation Rentals	Feels that a majority of the restriction reasons are invalid and therefore, restrictions are pointless; TSRA is not a residential community(most properties are second homes), won't impact affordable housing stock due to the expense of owning the properties, etc.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
32	6/25/21	Hughes, Nolan	N/A	Land Use	Access	H-27 trailhead symbol (SCSP: Willow Creek Coleman Valley Access) is on the wrong spot on the map. Should be a mile south west at the next corner of the Park property where Coleman Valley Rd intersects the Park land briefly.	Maps provide gene and are not intended to identify exact location of access points.
33	7/18/21	Hutchinson, Robert	N/A	Land Use	Vacation Rentals	In favor of new rules by TSRA. Finds the complaints shallow and not understanding of full time residents.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
34	6/23/21	Navarro, Keith	N/A	N/A	Misc.	"Why is there tracking on the link to the draft plan? There is no reason I should be tracked to see a government plan."	Comment noted.
35	7/17/21	Kesterson, Jonathan	N/A	Land Use	Vacation Rentals	Not enough info used for the TSRA's rules. There is no justification for taking a homeowner's right to rent away. STR's are a huge contribution to the local economy. This will not help affordable housing efforts because the houses are way too expensive for people anyway.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
36	7/19/21	Lucero, Susann	N/A	Land Use	Vacation Rentals	"As a renter in The Sea Ranch once a year since it was built..... you would be taking away the privilege of enjoying they offer and maintain with excellence. Rentals on the California coastand the coast should be open to the public !!! What gives you the right to take that happiness away from human beings ???--"	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
37	7/22/21	Mark	N/A	N/A	Map Edit	Fire department map: label colors for Bodega Bay and Bodega are reversed	Correction noted.
38	7/18/21	Newacheck, Paul	N/A	Land Use	Vacation Rentals	Supports limits listed in Model Rule 6.7. Prevents proliferation of rental properties and consistent w/ CA Coastal Zone Commission.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
39	7/17/21	Norman, Derek	N/A	Land Use	Vacation Rentals	Against restrictions, feels they are not the correct response. Derek has never had issues with a renter before and a majority of people who rent enjoy the quiet energy of TSR. States that the minority of TSR (full time residents) are abusing their power and that it's not fair.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

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40	7/20/21	Alexander, Kathleen	N/A	Land Use	Vacation Rentals	Restrictions are to appease a small group of people, and is not fair. Limiting coastal access for people, and Kathleen is worried that limitations for parking lots and public access trails are next.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
41	6/1/21	Liz Martin	BBFPD	Public Safety	Fire Hazards	There needs to be reevaluation and update of public safety response capacity; The District is underfunded and understaffed and needs better safety needs analysis.	Comment noted. Funding and staffing shortages should be reduced by recent consolidation.
42	10/7/21	N/A	BBPUD	Water Services	Revision	Revisions: The Bodega Bay District's 2007 Master Water Plan proposed with two new wells and the total capacity of the current water storage facilities is sufficient for build-out. The proposed two new wells were constructed, one at the Roppolo wellfield in 2008 and the Bay Flat well in 2018	Comment noted. T capacity for existing development, but the 2007 report does not address how climate change and sea level rise will a new sources necessary to accommodate the potential impact of climate change and sea level rise.
43	10/1/21	Kaun, Megan	Sonoma Safe Ag Safe Schools	Biotic Protections	Pesticides	Coastal Commission can regulate pesticides with LCP's. Wants to ban pesticide use in Sonoma County. A suggestion for language in the updated LCP could be: The use of synthetic pesticides, including insecticides, herbicides, fungicides, and lethal rodenticides or any toxic chemical substance that has the potential to significantly degrade biological resources in the Sonoma County Coastal Zone shall be prohibited, except where necessary to address invasive plant species. The eradication of invasive plant species shall consider first the use of non-chemical methods for prevention and management such as physical, mechanical, cultural, and biological controls. Herbicide application shall be restricted to the least toxic product and method, and to the maximum extent feasible, shall be biodegradable, derived from natural sources, and used for a limited time in order to minimize adverse impacts to wildlife and the potential for introduction of herbicide into the aquatic environment or onto adjacent non-targeted vegetation. Application of herbicides shall not take place during the winter season or when rain is predicted within one (1) week of application. In no instance shall herbicide application occur if <u>wind speeds onsite are greater than five miles per hour.</u>	Policies C-OSRC-7c, C-OSRC-7b, and C-OSRC-7c regulate pesticide use in the coastal zone.
44-01	9/30/21	Morgan, Laura	Save the Sonoma Coast	Land Use	LCP Revision: 3.2.2, C-LU4c, C-LU-5d, C-LU-1	Section 3.2.2 Insert intro and history of BHHA; traffic congestion now occurs year-round especially during nice weather, holidays, and weekends; bypass plan is no longer in the Caltrans plan; cplease correct all references to the proper BHHA; add: any new development must consider existing water needs of BHHA prior to granting new permits; add Due to our stipulated judgment only have single family units are allowed so this cannot be applied to BHHA; Assume this is referring to BHHA. Please change to: Homes in BHHA is a mixtures of full time residents, part time residents. and short and long term rentals; Add : BHHA expects that any decisions pertaining to vacation rental or accessory and junior dwelling units be discussed and approved by BHHA to assure compliance with the current stipulated judgement that BHHA operates under. BHHA has established Community Rules to address our standards that apply to both owners and renters.	Enforcement of Bodega Harbour CC&R's is limited to design review and approval of new development consi agreement recorded in Book 3242 Page 112, Sonoma County records.

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44-02	9/30/21	Morgan, Laura	Save the Sonoma Coast	Agriculture	LCP Revision: 3.6 Aquaculture	BHHA recommends an additional clause in the policy C-AR-7b which calls for a specific review mechanism to assess potential impact of any new Aquaculture Facility on surrounding residential neighborhoods. Proposed: C-AR-7b(6): The establishment of a aquaculture processing facility shall take into account input from local residents and homeowner associations in a transparent process.	A Coastal Development Permit and Use Permit are required for aquaculture facilities. (Table C-AR-3). This is a public process, and local decision is appealable to the Coastal Commission.
44-03	9/30/21	Morgan, Laura	Save the Sonoma Coast	Open Space & Resource	LCP Revision: Open Space & Resource Conservation 2.5.1; Policy C-OSCR-10(a) GP 2020	Update to reflect current use of exterior wood stains/paints in a limited pre-approved color palette or fiber-cement siding in similar colors;; Although it is clear that significant addition "process" would be required before new mining permits are granted to Cheney Gulch, it still seems appropriate to comment along the following lines: Review of any permit applications for mining in Cheney Gulch should take into account noise, traffic, and environmental pollution impacts to nearby residential areas as well as possible infringement of a conservation easement held by the County in this area and other coastal values	A Coastal Development Permit and Use Permit are to reopen the Cheney Gulch gravel mine. The approval process will require full environmental analysis.
44-04	9/30/21	Morgan, Laura	Save the Sonoma Coast	Public Access	LCP Revision: Public Access; 1.1, 1.2, 2.1, 2.1.2, 3.1.1, C-PA-1e, C-PA-1j, Goal C-PA-2, Policies C-PA-2a/2d	Add relationship to the "Public Safety Element"; Consider updated data sources; sp. BHHA; manage the use of public prescriptive rights in accordance with public safety, disaster response, and emergency response capabilities; feasible measures need to take into consideration public safety, disaster preparedness, and emergency response capacities; C-PA-2.9: assess needs for disaster preparedness to geological, fire, or medical emergencies and provide adequate resources; add route trail segments that are adjacent to residential areas so as to minimize residential conflicts and visual intrusions; route trails to avoid hazard zones; parking should not cause residential conflicts;	Historic use has not been evaluated by the California Coastal Commission Coastal Access Program to determine if a public prescriptive right of use or access can be recognized. The Public Access Element Section 3 contains policies regarding avoiding hazards, impacts to coastal resources, and neighborhood compatibility for development of public access ways.
44-05	9/30/21	Morgan, Laura	Save the Sonoma Coast	Water	LCP Revision: Water	The requirements are generally sensible in terms of preventing run-off, managing potential pollution. Developers will have to assure no substantive change in run-off even during the development phases for a new home. To facilitate permitting and the necessary studies, BHHA requests that for Permit Sonoma to establish web resources for BMPs and to facilitate identification of qualified organizations for conduct of studies. This could be a new Policy C-WR-10	All development must conform to North Coastal Regional Water Quality Control Board standards as well as Permit Sonoma grading and drainage regulations. These regulations already require low impact design and incorporation of BMP's into all construction projects that require a grading permit.
44-06	9/30/21	Morgan, Laura	Save the Sonoma Coast	Public Safety	LCP Revision: Public Safety 1.2, 3.2.4, Policy C-PS-5a, C-PS-6	add policy that develops disaster response options in case large and heavily populated/visited locations become landlocked due to unpassable roadways, such as establishing sea side disaster response. Encourage grazing/ranching as a form of fuel control; add an initiative that focuses on adequate general disaster preparedness.	The Sonoma County responsible for developing disaster evacuation and recovery plans. See Policies C-PS-1c through C-PS-1h for LCP policies related to supporting analysis of hazards that can support the Hazard Mitigation Plan.
44-07	9/30/21	Morgan, Laura	Save the Sonoma Coast	Transit	LCP Revision: Circulation & Transit: Policy C-CT-4k	Include the S. and North Harbour Intersections as list of intersections labeled as needing improvement.	Unclear what improvements are necessary.

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44-08	9/30/21	Morgan, Laura	Save the Sonoma Coast	Public Facilities	LCP Revision: Public Facilities and Services: 3.1.1, 3.2, 4, 6.1, 6.2, 7	Updated policy for water and sewer needs of any new development should be based on more current data and science. Additional law enforcement is needed for Bodega Harbour to enforce parking restrictions. Effective fire prevention needs to be implemented, mandated medical clinic should be established in Bodega Bay the increased need of emergency services due to the impact of burgeoning tourism.	Public Facilities and contains policy restricting extending water and wastewater service direct law enforcement to provide parking enforcement. Mandating construction of medical facilities is beyond the scope of the Local Coastal Plan and better addressed by Sonoma County Department of Health Services in partnership with local service providers and non profit health centers.
44-09	9/30/21	Morgan, Laura	Save the Sonoma Coast	Noise	LCP Revision: Noise: 4.2 C-NE-1	Board should express strong support for this initiative, as loud motorcycles or other vehicles without adequate noise control are a significant source of noise pollution	Regulation of licensed motor vehicles operating on public roads is not within the scope of the Coastal Act or the Local Coastal Plan.
45	8/25/21	Alexich, Jennie	BHHA	Land Use	LCP Revision	Expresses gratitude for continued involvement of BHHA in the drafting of the LCP. Feels that some particularly important aspects related to the specific history of BHHA have not been address in the LCP draft.	Comment noted.
46-01	N/A	Attachment	Bodega Bay Policy Comments	Transit	Transportation	3.2 Policies listed for Bodega Bay are not compatible with the true needs for BB. Really bad traffic along State Hwy 1.	It is unclear which the true needs of Bodega Bay, or how these needs were determined. Section 2 of the Circulation and Transit Element provides policies for reducing automobile dependency within the context of the Coastal Act.
46-02	N/A	Attachment	Bodega Bay Policy Comments	Land Use	Vacation Rentals	Biggest issue facing Bodega Bay is the proliferation of the vacation rental industry, fueled by the County's want and need for tax and permitting money generated in the area. Harbor View Development-- county is allowing 70 houses to be used for vacation rentals.	Comment noted. Harborview is still under development and comment is speculative.
47	7/26/21	Browne, Niall	N/A	Land Use	Vacation Rentals	Opposed to Model Rule 6.7	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
48	9/24/21	Charter, Richard	N/A	Biotic Protections	Offshore Wind	Shell and BP want a lease to develop an offshore wind energy farm off the Central Coast	Offshore facilities a Local Coastal Plan.
50	7/22/21	Cole, Megan	N/A	Land Use	Vacation Rentals	Opposes Model Rule 6.7 due to lack of adequate data and studies done by TSRA.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
51	9/20/21	Culcasi, Cindy	N/A	Public Safety	Fire Safety/Management	Wants an exception made for residents in regards to obtaining a coastal permit while performing fire abatement/fuel management. It is very expensive for something that is extremely important.	See Policies C-PS-5b through C-PS-5i and Initiatives C-PS-11 and C-PS-12.

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52	7/23/21	Dick, John	N/A	Land Use	Vacation Rentals	Opposes Model Rule 6.7 due to lack of adequate data and studies done by TSRA in regards to last minute inputs. Sees restrictions as a huge violation of personal property rights.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
53	7/26/21	Eggen, Cindy	N/A	Public Access	Trails	Inquiring about how the new plan and trail will affect the equestrian Bodega Bay dune trail and parking lot. Please preserve this trail and also separate bicycles separate for the safety of horses and riders.	Management of trail user groups will be carried out by California State Parks or Sonoma County Regional Parks and is not part of the LCP.
54	7/21/21	Cadwell, Cari	N/A	Land Use	Vacation Rentals	TSRA is enforcing segregated housing with these restrictions. "The Sea Ranch Association is not acting appropriately. This puts the homeowner at risk once the home owners allotted rental days have been met. Being a The Sea Ranch home owner I am not going to refuse any group of people from renting my home just because a Association has declared that I have used up my allotted rental days for the year. This is asking the home owner to discriminate denying equal access to housing or available units. "	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
55	7/30/21	Fenton, Kate	N/A	Water	Public Water Systems	"Bridgehaven Trailer Park Water System is Residential use, not Recreation. "	Bridgehaven water of a public water system as determined by the State Water Resources Control Board, Department of Drinking Water.
56	7/19/21	FitzGerald, Cathy	N/A	Land Use	Vacation Rentals	Issues at The Sea Ranch can be addressed individually. A blanket approach is divisive and unnecessary.	Unclear what aspect of the LCP this comment refers to.
57	7/26/21	Fraser, Eric	Truth in Tourism	Land Use	Vacation Rentals	Public outreach should be more robust. Lower RR should be considered an extension of protections for visitors. There is a bias against STRs by using false information. Performance standards should apply to ALL properties. More regulation means more empty homes which defeats the purpose of restrictions to leave room for worker/affordable housing. Misrepresents housing sotck on the coast (and inland). Won't release information to the public regarding how STR's provided resources for members of the public during the fires.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
58	8/17/21	Grahame, Margaret	Timber Cove Resort/Coast Kitchen	Water Services	Pipeline Provision	Requests a Pipeline Provision Recommendation by Permit Sonoma staff be included in the Local Coastal Plan update currently in process.	Allowing project to proceed under the current regulations will be a policy decision for the Board of Supervisors and California Coastal Commission.
59	7/20/21	Harbaugh, Leslie	N/A	Land Use	Vacation Rentals	She and her family rely on the income from their rental home in order to maintain upkeep, taxes, association fees. Common sense standards are fine but these restrictions are too much.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

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60-01	7/22/21	Haring, Kristen	N/A	Biotic Protections	LCP Revisions: Policy C-OSRC-5b(1)	" (regarding environmentally sensitive habitat) states in subpart (4) that "[a]reas that contribute to the viability of plant and animal species for which there is compelling evidence of rarity" are considered environmentally sensitive habitats. "Compelling evidence of rarity" is an uncertain, purely subjective standard that provides no guidance. It undermines the clear standards established in the policy's first three subparts, and will spawn disputes regarding whether there is sufficient evidence of rarity."	The determination 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" is based on "changing habitats, future improvements in identifying ESHA, regulatory changes, and scientific discovery", consistent with Policy C-OSRC-8a. The change in this policy was recommended by Coastal Commission staff to improve consistency with Coastal Act policies
60-02	7/22/21	Haring, Kristen	N/A	Biotic Protections	LCP Revisions: Policy C-OSRC-5e(3)	" (regarding marine habitats) states that "[p]ublic access to offshore rocks and onshore nesting/rookery areas used by seabirds to breed or nest or which provide habitat for seals and sea lions shall be prohibited." By addressing bird-nesting and seal-rookery areas with a single slashed phrase, the policy could be misconstrued to prohibit access to all areas that "provide habitat for seals." That would result in a prohibition of access along the entire Sonoma County coast. A clearer statement should be made by using separate clauses, such as: "Public access shall be prohibited to offshore rocks and onshore areas while seals and sea lions are using them as rookeries, and to offshore rocks and onshore areas while seabirds are using them to breed or nest."	See Policy C-OSRC-6e, which clarifies that protection is specifically provided for marine mammal haul-out grounds and nursery areas during pupping season.
60-03	7/22/21	Haring, Kristen	N/A	Biotic Protections	LCP Revisions: Policy C-OSRC-5e(5)	Similarly, Policy C-OSRC-5e(5) (regarding marine habitats) states that "[d]isturbance of marine mammal haul-out grounds shall be prohibited and recreational activities near these areas shall be limited to passive recreation [and] [d]isturbance of areas used by harbor seals and sea lions shall be avoided." This provision is overbroad and, again, contradicts the LCP's public-access goals. By failing to define "disturbance" and "passive recreation," the provision could be misconstrued to mean that human activity near a haul-out ground is prohibited.	See Policy C-OSRC-6e and C-OSRC-6g, which specify that closures are temporary when necessary to protect resources
60-04	7/22/21	Haring, Kristen	N/A	Biotic Protections	LCP Revisions: Policy C-OSRC-5e(6)	(regarding marine habitats) encourages the California Department of Fish and Wildlife to monitor marine mammal haul-out grounds annually "to determine their condition and level of use by marine mammals" and "to incorporate this information into its management plan for marine mammals." These provisions should acknowledge that there are numerous suitable haul-out grounds that marine mammals can and do use, and the number of such grounds in an area reduces the need to prohibit human activity on the relatively few accessible beaches.	See Policy C-OSRC-6e and C-OSRC-6g, which specify that closures are temporary when necessary to protect resources

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
61	7/28/21	Hichwa, Diane	N/A	OSRC	ESHA Maps Corrections	<p>Black point is where Bihler point is. Use of SR for seabird rookery and SN for seabird nesting. Map subarea 1 Gualala Pt island is an SR with 2000 birds. C-OSRC-5e(3) refers to protected area for seals and sea lions but does not have locations on map. Map subarea 1 very S end is missing important marine mammal haul out and large pupping area. Map subarea 5 at Ft Ross has a rock that is a consistent haul out for steller sea lions. Map subarea 6 near Jenner is missing haul out and pupping area for Harbor Seals at the mouth of the river. There is another haul out to the north of Russian gulch. Map subarea 9 Bodega Rock has SN but should include Marine Mammals with Harbor Seals, Steller Sea Lions and CA Sea lions PLUS it is SR a rookery for BRAC and now COMU. No map is showing ESHA for Snowy Plover (Doran Beach and Salmon Creek Beach) a listed and protected species. The Globally Important Bird Area of Bodega Bay should have protection of the mudflats and feeding areas for these birds. This area is also a crab nursery. And on the coast I believe there is no place for wind energy with its disturbance to marine mammal migratory routes and an extensive land grid would be needed to support and distribute the power.</p>	The ESHA maps are not comprehensive inventory of all ESHA due to changing habitats, future improvements in identifying ESHA, regulatory changes, and scientific discovery. Any area meeting criteria found in Policy C-OSRC-8a is considered ESHA.
62	7/26/21	Jacobs, Joseph	N/A	Land Use	Vacation Rentals	Believes that Model Rule 6.7 is unfair. Asks that the LCP does not endorse the TSRA rules.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
63	7/26/21	Kenber, Chris	N/A	Land Use	Vacation Rentals	Supports performance standards but opposes caps, number of days rented, and distancing. Majority of homes are 2nd homes. Number of STR has been the same for 15 years. Provides economic value for the community.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
64	7/21/21	N/A	North Bay Association of Realtors	Land Use	Housing	<p>Regulations that would prohibit a property owner from armoring their home or business to provide protection from rising seas and storm waves raises serious concerns pertaining to a regulatory taking without just compensation, and any such regulations must comport with the following Constitutional principles and the Coastal Act itself. MANAGED/PLANNED RETREAT is a commonsense land use practice where practical, especially in rural areas where existing structures can be relocated further inland when they are demolished and rebuilt, so that they will never need a shoreline protection device. This should be implemented where practical, however on some parcels, especially where there is not a deep enough area to relocate the development, managed retreat is not practical, and property owners must be allowed to defend their property from wave attack. These coastal communities are critical to CA both economically and culturally, and they should not be surrendered to the sea, as long as there is a viable method to protect them. Mandatory Rolling Setbacks should be replaced with Tiered Response. Oppose requirement of a deed restriction of property and the waiver of rights as defined in Appendix F (6). Placing deed restrictions on properties or requiring a waiver of rights directly impacts property value and could be considered a Taking requiring just compensation. Allow for maintenance and repair of shoreline protection devices. Oppose sections of the public safety element. We encourage the creation of an evidence-based program where small/individual owners that seek to rent their property can continue to fortify their income while complying with countywide standards, TOT requirements.</p>	<p>Policy C-PS-2d through C-PS-2h reflect Coastal Commission recommendation that shoreline protection be limited to protecting existing structures under limited circumstances where no feasible alternative can be identified. Policy C-PS-1a requires a deed restriction if development is approved within or adjacent to a hazardous area. Additional restrictions, recommended by the Coastal Commission are found in policies C-PS-1g through C-PF-1m. Shoreline protection devices are allowed in limited circumstances by Coastal Act Section 30235 "Construction altering natural shoreline" and Section 30253 "Minimization of adverse impacts" within the context of Section 30270 "Sea level rise" and consistent with protection of coastal natural resources.</p>
65	7/21/21	Lown, Anne	Department of Social and Behavioral Sciences	Land Use	Vacation Rentals	<p>Very opposed to the restrictions. A very big fan of the diverse groups of renters who come around to experience the coast. Not enough input from community before drafting the rules.</p>	<p>Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.</p>
66	7/26/21	Mabry, Cathy	N/A	Land Use	Vacation Rentals	<p>Opposes TSRA rules, feels that they are unfair towards all parties involved. Feels that the restrictions are without sound basis.</p>	<p>Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.</p>

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67	7/21/21	McMaster, William		Land Use	Parcel Questions	Believes the information in the LCP draft may not be correct and would like to offer some corrections. Parcel 109-050-012 public access plan regarding Ocean Cove is not correct. It has camping and cabins. Parcel 109-210-005 Looked like the zoning was to be changed and wants confirmation that this will not happen in writing. Parcels 109-050-010 and 109-050-030 are tourist commercial, why being changed to village commercial and how does that impact them. Parcel 109-190-007, their homes are the oldest in Timber Cove and they want to be included in the rural communities boundary. Policy C-PA-1d; community needs to know details if public trails around private homes will happen. Overall, feels very in the dark regarding the LCP draft.	See Policy C-LU-5h through C-LU-5j
68	7/26/21	Smit, Wendy	California Native Plant Society (Milo Baker)	Biotic Protections	Native Plant Protection	Suggestions: acreages of vegetative communities be estimated based on aerial analysis and added to the document. Figures C-OSRC-2a through 2k should be updated every 5 years to reflect documented occurrences or changes in such habitats. Policy C-OSRC-5b(2):: to fully determine if such species are present or absent, multi-year surveys must be conducted per proposed budget. Coastal terrace prairie is a sensitive natural community and should be preserved at all locations.	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. Program C-OSRC-8-P1 calls for review and update of C-OSRC-2a through 2k every five years.
69	7/20/21	Mack, MJ	N/A	Land Use	Vacation Rentals	Disabled senior citizen who does rely on the income source and also enjoys the community as it is with renters coming in.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
70	9/27/21	Morgan, Laura	N/A	Biotic Protections	Maps	https://www.bayarealands.org/maps-data/#maps This link is "Stream Conservation Targets and Connectivity" It shows habitat corridors. Worth considering.	Conservation Lands Network mapping is one of the many tools used to develop the Local Coastal Plan.
71-1	7/26/21	Poehlmann, Chris	N/A	OSRC	C-OSRC-7 Fire Resiliency Plan	Mandated shaded fuel break silvicultural prescriptions in Timber Harvest Plans along county roads. Continue to protect view corridors and county roads. Prescription burns can happen all the way up to the road's edge and creates visual blight.	Policies in the Publ "Wildland Fire Hazards" provide a framework for reducing fuel loads and provide a basis for requiring Timber Harvest Plans to provide shaded fuel breaks and other measures to reduce wildland fire risk.
71-2	7/27/21	Poehlmann, Chris	N/A	OSRC	C-OSRC-7 Fire Resiliency Plan	I would also like to request another public meeting scheduled so that the community has the proper time and resources to comment fully on this effort.	Comment noted.
71-3	7/27/21	Poehlmann, Chris	Attachment	OSRC	C-OSRC-7 Fire Resiliency Plan	Attachment regarding prescribed burns	Comment noted.
73	7/21/21	Alexander, Kathleen	N/A	Land Use	Vacation Rentals	No issues with renters in the past, nor have their been issues with other people renting. Covid brought more people to the community which was nice. The rules are overkill to appease a small group of people. Too many limitations for no reason.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

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74	7/20/21	Quatman, Teri	N/A	Land Use	Vacation Rentals	Against the new restrictions but feels that there should be specific complaints like noise and littering that get addressed individually rather than shutting down the whole rental activity.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
75	7/20/21	Snidle, James	N/A	Land Use	Vacation Rentals	Opposed to restrictions. No complaints from full time residents about the other couple that is there the other 6 months of the year. Depends on the rental income.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
76	7/22/21	Sakhuja, Sanjay	N/A	Land Use	Vacation Rentals	Owned the home for 30 years and it is his primary source of income. Feels that the restrictions will take away his income.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
77	7/22/21	Shere, Sarah Hoople	N/A	Land Use	Vacation Rentals	Very against restrictions-- see no negatives thus far with short term rentals.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
78	7/19/21	Spain, Kyle	N/A	Land Use	Vacation Rentals	Opposed to restrictions. Not enough data collected or studies conducted to support or back up these restrictions.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
79	7/21/21	Thorsen, Lars	N/A	Land Use	Vacation Rentals	Economic impact assessment should be conducted due to tourism being a huge contributor to the local economy. Major economic damage to family if restrictions are enforced.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
80	7/20/21	Ward, Greg	N/A	Land Use	Vacation Rentals	Majority of homes are rentals, and the restrictions about distance don't even make sense. Many issues and problems being addressed apply to permanent residents too.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
81	7/23/21	White, Molly	N/A	Land Use	Vacation Rentals	Opposes Model Rule 6.7. It is not fair that the opinions of a small group in The Sea Ranch should get to impose these rules on everyone else.	Policy in LCP does not concentrate on Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
82-1	7/21/21	Neary, James; McEnhill, Don; Majorana, Ariel	N/A	Water Resources	Russian River	Policy C-WR-1a: Policy should be applicable to impaired and pristine waters alike throughout the zone. Policy C-WR-1b(4): There should be consideration for hillside projects outside of this 200 foot zone, especially when runoff goes directly to waterways below. A project's location on a hillside above a waterway will result in runoff and negative impacts to the water quality below them. As runoff cuts drainage gullies/channels through the hillside the impacts to the waterways below will only increase through erosion and the amount of water carrying sediment that makes it down the hill. Policy C-WR-1b(4): It needs to be made clear whether "feasible" includes consideration of economic cost or not. We highly suggest that it does not allow consideration of economic cost. If cost is so high to mitigate a project sufficiently, then the project needs to either be changed, cancelled, or moved to a different location. This is true for use of "feasible" throughout the water resources element. Policy C-WR-11: This policy must also require some demonstration that actions are shown to be effective for that particular site location—that the action will do what it says it will do. This policy also needs expanded to require that there will be no new non-point source pollutants entering the waterways due to use of sufficient BMPs. Policy C-WR-2d: "Encourage" should be changed to "require." Without necessary data from all water suppliers and groundwater wells, Sonoma County is tying its own hands and preventing informed decision-making that will benefit all of Sonoma County. Policy CWR-4g: Encourage property owners to incorporate only native, drought tolerant, and low water use plants to conserve water and reduce the potential for runoff and erosion.	In the context of a Local Coastal Plan, "feasible" is defined by Coastal Act Section 30108 as "That which is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal and technological factors." Local Coastal Plans are required to be consistent with the provisions of the Coastal Act.
82-2	7/21/21	Neary, James; McEnhill, Don; Majorana, Ariel		Circulation and Transit	Russian River	The effects of climate change will continue to make the coastline less accessible than it is now. Possible improvements to access points would be repairing infrastructure, natural erosion and flooding controls should be implemented instead of hard barriers. Finally, available public transit is inaccessible to anyone outside of The Sea Ranch, Point Arena, and Gualala city limits since the MTA (only public transit to Santa Rosa) picks up in town, and it does not have any routes through nearby rural areas despite a significant portion of Sonoma County's population residing in these areas.	Repair of infrastructure will be part of implementation. Sea level rise and climate change impacts to transportation are addressed in Objective C-CT-4.1, Policy C-CT-4i, and Program C-CT-1-P2. Also see Public Safety Element Section 4 "Sea Level Rise Hazards" for additional policies related to sea level rise.
82-3	7/21/21	Neary, James; McEnhill, Don; Majorana, Ariel		Cultural and Historical Resources	Russian River	When consulting on areas of cultural and historical significance in Sonoma County and for related resources, it is important that local tribes are included. This means through all stages, from beginning to end, and this is especially true for lands and resources that historically belonged to local tribes.	The Cultural and H developed in consultation with Federated Indians of Graton Rancheria
82-4	7/21/21	Neary, James; McEnhill, Don; Majorana, Ariel		Public Access	Russian River	Sonoma County should focus on limiting this privatization and encouraging the use of public easements to protect these public access points. Along with the need for easily accessible public access points is a need to keep our public trust resources clean and in their natural state. Policy C-PA-3o helps provide for some of this, but is limited to only the "major" facilities. There is also little detail on the monitoring and oversight of these facilities. To truly protect our resources there has to be sufficient trash receptacles and waste facilities to last a tourism-packed weekend, as well as staff to help empty and maintain those facilities.	Operation of access points will be addressed as part of implementation. The Public Access Plan (Appendix B) prioritizes development of public access points.

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83	9/14/21	Neale, Bob	Sonoma Land Trust	Public Access	Map Correction	K2 is located on our Preserve and is identified on map C-PA-1k as an "Access Point/Trailhead." I read this as meaning it is either an Access Point or a Trailhead. In this case, clearly it is an Access Point, not a Trailhead. The narrative in the draft LCP correctly identifies our Estero Americano Preserve as a place where the public can access the coast via SLT's limited guided activities. Section 27.1 and 27.2 of the draft LCP clearly and accurately explains this use. On page 116, it states that "the Sonoma Land Trust ... owns property adjacent to the Estero Americano. At this point public access is limited to tours and interpretive programs." On Page 89 of Appendix B of the draft LCP, there is further language describing that "access is only through infrequent scheduled guided outings available to the public." In addition, SLT has received significant public funding to protect lands adjacent to the Estero and to conduct the activities as described above. The description of K2 is consistent with how we have managed the Preserve in the past and are using it at present relative to public access. From our perspective, there just doesn't seem to be grounds to request moving it from the map.	Comment noted. A to remain on the Public Access map Figure C-PA-1k.
84	7/26/21	Trombley, Laura	N/A	Land Use	Vacation Rentals	Asks for the LCP to reject TSRA restrictions. There are already very many restrictions with The Sea Ranch properties and it is only for the minority's benefit which is elitist.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
85-REPE AT	7/23/21	White, Molly	N/A	Land Use	Vacation Rentals	Owners of a The Sea Ranch vacation rental and would not like the rules to be implemented. She and her husband support performance standards and common sense rules, but feel that the TSRA Model Rule 6.7 is too restrictive and financially devastating.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
86-1	7/22/21	Merchant, Jennifer	The Sea Ranch Association	OSRC	Land Use	OSRC 5B10 pg 21 and C-LU-4 pg 27: TSRA suggests that they and the other stakeholders should be engaged in developing the implementation plan to ensure it is streamlined in a way that does not increase due diligence costs and clarifies TSRA and County roles and responsibilities. C-LU-4: TSRA requests that PRMD staff work with association staff and stakeholders in the development of this document. LCP should include a timeline for implementation.	Program C-LU-6-P2: Develop a comprehensive manual outlining policies and procedures for processing permit applications within The Sea Ranch. The manual will outline the roles, responsibilities, and authorities of The Sea Ranch Association, Sonom Water Quality Control Board, and California Coastal Commission, and provide clear direction for both landowners and agencies when processing applications within The Sea Ranch.
86-2	7/22/21	Merchant, Jennifer	The Sea Ranch Association	OSRC	Land Use	LU-5: Grammar. LU-10: TSRA is unclear on where the County intends to apply land use designations in relation to designated open spaces. Thousands of acres on TSRA commons are designated as open space, some are for use of private recreation and should not be required to be set aside as open space.	The Open Space land use designation does not prohibit passive recreation regardless if the area is open to the general public or for the exclusive use of property owners. The only restriction is residential, comme
86-3	7/22/21	Merchant, Jennifer	The Sea Ranch Association	OSRC	Land Use	LU-22 Policy C-LU-6f: TSRA requests clarification on whether flight path restrictions do or do not apply adjacent to its air strip and that the specific sites being considered for overnight lodging be more specifically identified.	Regulation of civil aviation is beyond the scope of the Local Coastal Plan.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
86-4	7/22/21	Merchant, Jennifer	The Sea Ranch Association	OSRC	Land Use	LU-26 Policy C-LU-2i: Unclear how urban service boundaries apply to the fixed boundaries of The Sea Ranch.	Urban Service Areas boundaries are established by areas served by public water and wastewater services, including on-site wastewater management districts. In the case of The Sea Ranch, this boundary is coterminous with the boundary of The Sea Ranch subdivision.
86-5	7/22/21	Merchant, Jennifer	The Sea Ranch Association	OSRC	Land Use: Housing	LU3-4: TSRA would like to point out a couple concerns about the illogical ranking of high priority listed housing.	Comment noted.
86-6	7/22/21	Merchant, Jennifer	The Sea Ranch Association	OSRC	Land Use: Housing	LU-27-C-LU-2: Addresses affordable and workforce housing. The two concepts are incompatible. Highly paid staff at The Sea Ranch can't afford to live on the coast. Most of TSRA employee housing are for the local business workers. TSRA is ready to engage in future implementation measures that acknowledge and prioritize the dire housing situation.	Policy is not specific to The Sea Ranch, and many workers in visitor serving jobs qualify for affordable housing.
86-7	7/22/21	Merchant, Jennifer	The Sea Ranch Association	OSRC	Public Facilities and Services	<p>Page PF-2-14: Pag PF-2, Table C-PF-1- Update numbers for The Sea Ranch Water Company. Current correct numbers:</p> <ul style="list-style-type: none"> • Lots Served 1,862 • Vacant Lots: 439 <p>Page PF-13- Fourth paragraph: replace "The Sea Ranch, staffed by CalFire personnel funded through CSA 40" with "North Sonoma Coast Fire Protection District (serving The Sea Ranch and Annapolis), staffed by CalFire contract personnel" [note CSA 40's successor agency is no longer involved in our funding stream]</p> <p>Page PF-14- Second line: Correct name is North Sonoma Coast Fire Protection District</p> <p>Emergency Medical Services section: First paragraph, second line: delete "Gualala Health Center"; replace with "Redwood Coast Medical Services (RCMS)" Second paragraph, third line- strike "of communities"—this is a typo.</p>	Number of connections is as reported to Water Resources Control Board, Department of Drinking Water. Vacant lot number will be noted for technical correction as will corrections to the Public Safety Element.
87	10/1/21	Coates, Rick	EcoTourism and Green Travel	Transportation	Transit	Policy CT-3f in the transportation section of the proposed Coastal Plan is insufficient to prevent increases in GHGs and VMTs. It should be policy to provide these facilities quite independent of their effect on GHGs and VMTs if the County is serious about climate change (for which there is little tangible evidence), the County will simply prohibit projects that increase GHGs or VMTs..	Policies in the Local Transit Element will reduce VMT and GHG emissions, but a prohibition of all projects that increase VMT is not consistent with public access provisions of the C.

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88	10/6/21	O'Byrne, Eamon	SLT	OSCR	Public Access	<p>SL T is pleased to see the "preservation of natural resources ... outdoor recreation ... and the preservation of archaeological, historical, and cultural resources" and the protection of Environmentally Sensitive Habitat Areas (ESHA) as core principles of the LCP. Sonoma Land Trust supports the County's commitment to preserve and expand appropriate public access and use of the coast for all Californians. As the Coastal Act clearly states it is" essential to the economic and social well-being of the people of this state and especially to working persons employed within the coastal zone. 11 n terms of specific suggestions, the Public Access Element FIGURE C-PA-1k (SubArea 10 Valley Ford) correctly identifies SL T's Estero Americano Preserve as a point of public access because we provide limited guided activities and environmental educational opportunities. Because the Estero Americana Preserve is not currently open for unguided public access and is surrounded by many private residential and ranching properties, we would recommend that it would be clearer if the maps denote whether or not a public access point is actually on public or private lands. For example, using a different color designation such as yellow for Point K2 to denote a public access point on private land or green for locations such Point I-30 on map FIGURE C-PA-1j (SubArea 9 Bodega Bay Vicinity) on public land, would help the public and private landowners better understand potential limitations and differences <u>between these access points.</u></p>	Future figures showing public access will clearly identify access points that are proposed or only open by permission from the property owner.
89	10/6/21	N/A	The Sea Ranch Hosting Coalition	Land Use	Vacation Rentals	<p>Concerns about the Association's input to your commission for the October 7 meeting. While we support the Association's position on ESHAs we are concerned about its suggestion to add the words "community character" to the reasons for STR land use policies. Without qualification, "community character" can be a highly charged term with a very subjective interpretation. It has been used elsewhere in the past as a Trojan horse for implementing discriminatory housing policies. We believe that the County should limit any short term rental restrictions to the environmental reasons already proposed. The Sea Ranch Association's desire to add "housing" as a reason for STR land use policies on the ranch ignores the fact that there is no set of circumstances where a reduction in short term rentals would result in greater, or indeed any, availability of affordable housing. With the median The Sea Ranch real estate prices well in excess of \$1 million, this is economically unrealistic. Solutions to the <u>housing challenge will need to be developed outside The Sea Ranch.</u></p>	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
90-1	1/12/22	Sklenicka. Carol	N/A	Land Use	Vacation Rentals	-Page 2-3 notes fast growth of vacation rental industry with now 550 residences registered and I would guess twice that many or more actually serving this function. So impact of these visitors is a primary concern.	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
90-2	1/12/22	Sklenicka. Carol	N/A	Land Use	Housing	-Page 3 notes construction of new residential units- are any full-time residences? What is their impact?	Comment is unclear
90-3	1/12/22	Sklenicka. Carol	N/A	Land Use	Housing	-Page 2-3: Do not understand population projections: 3,359 for 2023 on page 2, but page 3 is 11,700 with 3,283 new residents.	Projections are onl background, and ar

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
90-4	1/12/22	Sklenicka. Carol	N/A	Land Use	Housing	-The population in the Coastal Zone was 3,690 and 3,385 residents in 2000 and 2010, respectively (U.S. Census). The population estimates for 2018 and 2023 are 3,427 and 3,359 residents (Permit Sonoma GIS Community Profile).	Census boundaries are not consistent with coastal zone boundaries.
90-5	1/12/22	Sklenicka. Carol	N/A	Land Use	Housing	-The Sonoma County General Plan 2020 Land Use Element for the Sonoma Coast planning region projects 3,283 new residents resulting in a total population of 11,700 by 2020 for the entire planning area, including inland portions.	Data shown is from 2010 census and only intended to provide background, and are not used in policy.
90-6	1/12/22	Sklenicka. Carol	N/A	Land Use	Land Use	-Page 5: This sentence needs some punctuation- does not make sense: The Local Coastal Program contains 13 base zone districts twelve land use categories in five general use categories. -Page 19: Commercial Tourist Areas:	Comment appears the Local Coastal P
90-7	1/12/22	Sklenicka. Carol	N/A	Land Use	Tourism/Water	I think Jenner is already at its maximum for lodging with River's End and Jenner Inn and numerous registered and unregistered vacation rentals. Also, parking is already at a premium. No new lodging should be permitted. New retail or restaurants would also increase already existent problems with air pollution and parking, as well as impact on local services. Development in Jenner and Goat Rock is restricted by limited water supply. The Jenner Water System cannot support any more development. As noted on page 50 of this document, "Served by a mutual water system, there is a moratorium on water hookups due to inadequate water supply." ["there is" should be replaced by "Jenner has" to remedy dangling modifier and resultant lack of clarity in this sentence.] Full-time local residents are impacted by the number of visitors who occupy vacation rentals. Vacation renters tend to use water with abandon (statistics should be gathered on this) and make it expensive for full-time residents to live here. Restrictions on development should be strictly maintained and efforts should be made to encourage full-time affordable housing instead of tourist facilities.	Policies in Public Facilities Element prohibit new development where water and wastewater (including septic capacity) are inadequate.
90-8	1/12/22	Sklenicka. Carol	N/A	Land Use	Land Use	-Page 21: Criteria: I am concerned that these criteria are not adequate to prevent development of vineyards in agricultural lands; also concerned that vineyard development could lead to visitor-serving commercial uses.	Tasting rooms and visitor serving uses are not allowed in agricultural zones. See Table C-AR-3
90-9	1/12/22	Sklenicka. Carol	N/A	Land Use	Vacation Rentals	Page 22: Criteria for Commercial Services: -2) Any promotion of vacation rentals or lodging for visitors is ipso facto a reduction of opportunities for affordable or workforce housing. -4) "The amount of land designated for local-serving commercial uses shall be consistent with the population projected for the local market area." Two different projected population numbers are given on pp. 2-3. Additionally it's a difficult standard to apply when they are many second homes.	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
90-10	1/12/22	Sklenicka, Carol	N/A	Land Use	Vacation Rentals	-Page 25: Permitted use on Rural Residential lands: restriction so single family residential use should be defined to limit vacation rental use. Suggest vacation rentals be limited to 20 weekends or 100 days a year—or less if possible. The category of single family residence is a misnomer if dozens of families are rotated through the same house every year. Suggest that through the MAC the coastal communities could recommend an appropriate restriction of vacation rentals. Limiting vacation rentals would increase affordable housing for full-time workforce residents.	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
90-11	1/12/22	Sklenicka, Carol	N/A	Land Use	Biotic Protections	-Page 48: "The California Coastal Act of 1976 encourages providing support facilities for visitors to the coast, especially those available to the public at a moderate cost." This statement needs to be updated. The Sonoma Coast is already at carrying capacity; additional visitors will have a detrimental impact on preservation of resources and sensitive habitats. Suggest we look to other counties' LCPs for ways to PROTECT while still allowing public access. The fact that (as stated on same page) Jenner is unincorporated makes it vulnerable to poorly reviewed development. Can the MAC become a body for local review?	Identifying a decision-making body for coastal permit review is beyond the scope of the Local Coastal Plan.
90-12	1/12/22	Sklenicka, Carol	N/A	Land Use	Water Resources	-Page 50: "Additional inns, hostels, or similar facilities would be in keeping with Coastal Act policies which encourage visitor-serving facilities in existing developed areas. Served by a mutual water system, there is a moratorium on water hookups due to inadequate water supplies." Additional visitor-serving facilities would be a problem for Jenner. We need to state clearly that water and septic are not the only limitations.	Public Facilities and Services Element identifies water and wastewater constraints in Jenner. Comment is unclear on what other constraints exist in Jenner.
90-13	1/12/22	Sklenicka, Carol	N/A	Land Use	Public Access	-Page 51: Bridgehaven is privately owned. Unclear what is meant by efforts to acquire public access.	"Public access" incl boat launch facilities by the public.
90-14	1/12/22	Sklenicka, Carol	N/A	Land Use	Vacation Rentals	-Page 52: Chart lists 21 lodging/motel rooms in Jenner. Please note that cottages that are part of Jenner Inn are essentially vacation rentals, which means they have displaced housing for full-time workforce residents.	Policy in LCP does not restrict concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
90-15	1/12/22	Sklenicka, Carol	N/A	Land Use	Water Resources	p. 53 "Policy C-LU-6a: "Encourage the development and expansion of visitor-serving and local-serving commercial uses within urban service areas and rural community boundaries where water supply and wastewater disposal requirements can be met." As stated elsewhere, I do not think there should be any encouragement or expansion of visitor or local facilities in Jenner. To expand would imply that you are going to allow water to be trucked in and waste to be trucked out – which would have negative consequences for traffic and other public services and parks.	The Local Coastal Plan does not have any policy that would allow development on a site where water and wastewater had to be trucked in.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
90-16	1/12/22	Sklenicka, Carol	N/A	Land Use	Vacation Rentals	Policy C-LU-6b: Limit new visitor-serving commercial development to areas within designated urban service areas and rural community boundaries except for the lowest intensity development (i.e., guest ranches, and bed and breakfast inns, vacation rentals, and agricultural farmstays). The listed items are NOT low-intensity!!! How is this low intensity measured? These terms need to be carefully defined and limited.	Low intensity is eva community. What is low intensity in Bodgea Bay might not be consi visitor serving devleopment requires a coastal development permit, and impacts are evaluated at the project level.
90-17	1/12/22	Sklenicka, Carol	N/A	Land Use	Water Resources	p.54 Policy C-LU-6c: Provide public restrooms and drinking water facilities where needed and appropriate as part of visitor and local-serving commercial development. (Existing LCP Revised) Jenner currently had NO public restrooms except port-a-potties which are provided by state parks at Visitor Center, by post office, and by privately owned gas station. How is this provision to be squared with water restrictions?	This policy applies across the entire coastal zone. There may be areas where local resources may not allow providing water or restroom facilites.
90-18	1/12/22	Sklenicka, Carol	N/A	Land Use	Water Resources	Policy C-LU-6d: "Consider modest scale expansion of existing visitor-serving and local serving commercial uses outside of urban service areas and rural community boundaries where water supply and wastewater disposal requirements can be met." What does this mean???? "can be met" is very ambiguous and would seem to open a loophole for water to be trucked in / waste to be trucked out. Statement needs to be clear.	The Local Coastal Plan does not have any policy that would allow development on a site where water and wastewater had to be trucked in.
90-19	1/12/22	Sklenicka, Carol	N/A	Land Use	Water Resources	p. 55 Policy C-LU-6o: "Encourage a modest infill of visitor and local-serving commercial development in Jenner if water supply and wastewater treatment and disposal requirements can be met." This statement is troubling because of ambiguous reference to water and waste treatments! Met how? See previous remarks.	No development could be approved without adequate water and wastewater capacity.
90-20	1/12/22	Sklenicka, Carol	N/A	Land Use	Vacation Rentals	-GENERAL OBSERVATION: Given the limitations on responsible building, the looming issues of climate change, and the already overwhelming impact of tourism on local residents and local environment, it seems like a limitation on VACATION rentals would be the best way to protect our environment and increase affordable housing for fulltime residents who make up our workforce and maintain our communities and do the volunteer work that makes our parks attractive for all. -On a related note, every effort should be made to restrict any form of viniculture in the coastal zone. Grape-growing needs to be separated from agriculture.	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone. Table C-AR-3 requires a Coastal Devleopment Permit for vineyards, unlike grazing, which is a use by right.
91	2/3/22	Carpenter, Ernie	N/A	Land Use	Urban Growth	Expresses concern at the ability for people in rural to develop housing etc. on their land, as it is gentrifying the rural community. Locals are having a hard time affording to live in new rural housing. "Fringe development looks like huge corporate-owned wine processing facilities, with restaurant and curlicue stores added."; "We now have housing complexes in agricultural zoning due to parcel loading.". The Board did not recognize water-scarce areas, fire-prone areas nor dispersed service costs in densification of properties. When services are dispersed, law enforcement and firefighting costs go up. There should not be commercial development on roads less than twenty feet wide. Mentions the downsides of vacation rentals and that returning vacation rentals to permanent housing could help with the housing crisis. Sewer upgrades must meet capacity needs.	Table C-LU-1 identifies affordable housing as a local priority use o market rate housing. Policies in the Water Resources element address water supply, groundwater depletion, and wastewater disposal.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
92-1	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>-Page AR-2, 2.1, FARMLAND IN THE COASTAL ZONE</p> <p>Comment: There is no explicit mention of the Williamson Act and Agricultural Preserves in this section.</p> <p>Recommendation: Here is suggested language from the 2008 LCP: "Many landowners in the Sonoma coastal zone have demonstrated a commitment to agriculture by entering into Williamson Act contracts. The California Land Conservation Act of 1965 (the Williamson Act) allows counties to establish agricultural preserves and thereby give tax reductions to landowners engaged in commercial agricultural operations. Under current law, lands under contract are appraised by the county assessor for their agricultural productivity rather than market value. When an agricultural preserve is formed, State law requires all lands in the preserve to be zoned to prevent land uses incompatible with agriculture within the preserve. In signing a contract with the County, the landowner agrees to retain his land in agricultural uses for at least ten years."</p>	Participation in Land Conservation Act and Farmland Security Zone programs ("Williamson Act") is specifically addressed in Policy C-AR-1.7, Policy C-AR-1j, and C-AR-1k. Participation in a land conservation contract is also listed as one of the criteria that may be used to apply agricultural land use designation.
92-2	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>Page AR-4, 4.1 RESIDENTIAL SUBDIVISION POTENTIAL</p> <p>Comment: What does RESIDENTIAL SUBDIVISION POTENTIAL mean? This header implies that Ag land will be converted to residential subdivisions, in contradiction to Page AR-2, 1.1 PURPOSE: "The California Coastal Act protects productive resource lands, including agricultural lands, and establishes agriculture as a priority use and emphasizes the retention of agricultural land in production."</p> <p>Recommendation: Please directly cite Coastal Act Section 30222: "The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry." "Complaints about noise, odors, flies, spraying of pesticides, and similar nuisances related to agricultural practices may discourage and sometimes prevent farmers from managing their operations in an efficient and economic manner."</p>	Policies C-AR-1a through C-AR-1e provide protections against subdivision of agricultural lands and conversion of lands to non agricultural uses.
92-3	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>Comment: Pesticide applications are not necessary to efficient and economic agricultural operations. Witness the burgeoning market for organic products and the public and environmental health risks of pesticide application. Their use in the Coastal Zone is inadvisable altogether, due to both human and biotic impacts such as pollinator, bird and mammal by-kill.</p> <p>Recommendation: Please omit "spraying of pesticides".</p>	Policies C-OSRC-7c, C-OSRC-7b, and C-OSRC-7c regulate pesticide use in the coastal zone.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
92-4	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	Objective C-AR-1.1: "Avoid the conversion of agricultural lands to residential or non-agricultural commercial uses." Comment: "Avoid" is too weak a word to use in the context of Ag land commercial uses. Recommendation: Please change the word "avoid" to the word "prohibit".	Comment noted.
92-5	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	Policy C-AR-1a: "The following criteria shall be used for approval of subdivisions on designated Land Extensive Agriculture or Diverse Agriculture: (b) agricultural conversions shall be limited and evaluated on a case-by-case basis....." Comment: As has been seen in the costly and contentious 5-year struggle to create a Sonoma County Winery Event Ordinance, lack of clear criteria for application permitting, administered on a case-by-case basis, leads to unnecessary expenditure of County time and effort as well as public conflict. Recommendation: We strongly recommend outlining specific criteria for agricultural conversions in this LCP Update for public review, in advance of its presentation to the Board of Supervisors.	Tasting rooms and visitor serving uses are not allowed in agricultural zones. See Table C-AR-3
92-6	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	Policy C-AR-1b: "Subdivisions on designated resource and agricultural lands shall be permitted only for development related to the pursuit of either agriculture or forestry, as appropriate; and only with mechanisms such as open space or agricultural easements to ensure the long-term protection of agriculture and resource production. (EXISTING LCP REVISED)" Comment: Objective C-AR-1.2 and the Policies which follow express intent and detailed plans, at the discretion of Permit Sonoma, to convert agricultural land in the coastal zone to residential subdivisions. Even with the proviso that they.... "shall be permitted only for development related to the pursuit of either agriculture or forestry, as appropriate", there is no clear definition of the word "appropriate" or specific examples of what those pursuits would be. Since agricultural product promotion is deemed essential to agricultural profits in Sonoma County, it is logical to assume that there would be more visitor-serving commercial uses of agricultural lands in the Coastal Zone, such as promotional events, as a result. Recommendation: We strongly recommend that Objective C-AR-1.2 and Policies C-AR-1a and 1b be struck from the LCP Update entirely and replaced with specific criteria for subdivision permitting, as stated above.	Table C-AR-3 prohibits tasting rooms and visitor serving use in agricultural land uses. Minimum parcel size in Diverse Agriculture is 160 acres, so a parcel would need to be 320 acres for a two-lot subdivision.
92-7	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	Page AR-6, PROTECTION OF AGRICULTURAL LAND GOAL C-AR-2: "Maintain agricultural production by limiting intrusion of urban development on agricultural land. Objective C-AR-2.1: "Limit intrusion of urban development in agricultural areas." Comment: "Limit" implies intention to permit urban intrusion in agricultural lands. Even with conditions, this is contradictory to the Coastal Act and contradicts the previous rhetoric of PROTECTION OF AGRICULTURAL LAND. Recommendation: Replace the word "limit" with the word "prohibit".	Comment noted.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
92-8	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>Objective C-AR-2.3: "Limit extension of sewer and other urban services beyond the Bodega Bay Urban Service Area Boundary and Rural Community Boundaries."</p> <p>Comment: "Limit" again implies intention to permit extension of sewer and other services, presumably water, beyond the Bodega Bay Urban Service Area Boundary and Rural Community Boundaries. The Coastal Zone is a Class 4 Water area and drought is the new normal.</p> <p>Recommendation: Change the word "limit" to the word "prohibit", or drop this Objective and any other language promoting public services outside of urban or rural community boundaries, save for failed septic systems that pose a public health risk.</p>	<p>Policies in the Public Facilities & Services Element prohibit extension of service except when necessary to abate a failing septic system. See Policy C-PF-2e through C-PF-2h.</p>
92-9	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>Policy C-AR-2c: "Extension of urban services.....shall be limited to....solve existing health and safety problems, unless allowed by the Public Facilities and Services Element or Policy C-AR-7b (aquaculture)."</p> <p>From Public Facilities and Services, Policy C-PF-2a: "In areas with limited service capacity, new development for a non-priority use, including land divisions, not specified above, shall only be allowed if adequate capacity remains for Coastal Act priority land uses."</p> <p>and Policy C-PF-2e(4): "Use agreements, covenants and zoning to limit the growth inducement potential of extension of public sewer services."</p> <p>Comment: These policies are essentially providing for new development for non-priority uses outside of urban and rural community boundaries by extension of water and sewage services. There is no definition of "adequate capacity" remaining for Coastal Act priority land uses. The use of "agreements, covenants and (pending) zoning is not defined, specific nor enforceable.</p> <p>Recommendation: Change Policy C-AR2c by dropping the words: ".....unless allowed by the Public Facilities and Services Element or.....".</p> <p>Page AR-7</p>	<p>Policy C-PF-2d requires that all water and wastewater service providers prepare a master plan evaluating capacity, need for future facilities, and impacts of climate change and sea level rise will have on their facilities. New connections are not allowed prior to preparation and review of the facilities master plan.</p>
92-10	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>Policy C-AR—3a: ".....and spraying of chemicals."</p> <p>Comment: "Spraying of chemicals" does not specify what type they may be, (e.g., copper sulfate, synthetic pesticides, hormones or fertilizers). There are differences between the public health effects of various sprays.</p> <p>Recommendation: Please specify the types of chemical sprays being referred to and expressly exclude the spraying of pesticides or application of rodenticides in the Coastal Zone.</p>	<p>See Policies C-OSRC-7c through C-OSRC-7e.</p>

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
92-11	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>Page AR-8, 4.3 AGRICULTURAL SUPPORT USES Vineyards and Wineries in the Coastal Zone (margin) Comment: The overarching theme of this aside is one of reassurance that there have never been wineries in the Coastal Zone for a variety of reasons. However, it is noted that "there are wineries within a mile of the Coastal Zone" and that "a Coastal Development Permit would be required", an historically obtainable goal. Given the desirability of a cooler climate for many wine grape varieties in the current setting of Climate Change, it is easy to picture vineyards and wineries permitted in the Coastal Zone in future. The vast majority of vineyards in Sonoma County use synthetic pesticides, remove trees, rip land in an erodible manner and require access roads and heavy equipment. These practices would be ecologically disastrous in the Coastal Zone and strongly opposed by the public. Recommendation: Prohibit vineyards and wineries in the Coastal Zone.</p>	Comment noted. Vineyards would need to demonstrate there is no long term impact to coastal resources as part of the permitting process.
92-12	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>4.3.2 Agricultural Visitor-Serving Uses (Agricultural Tourism) "Examples-of these uses are farm-stays.....". Comment: There is countywide difficulty passing a vacation rental ordinance and no vacation rental regulation whatsoever in the Coastal Zone. Recommendation: Please define "farm-stay" and "hosted rentals on agricultural land with regard to their physical setting, purpose, host requirements and activities related to the experience of farm life for visitors.</p>	The glossary define lodging accommodations containing five or fewer guestrooms in a single- family dwelling or guest quarters provided as part of a farming operation, with an on-site farmer in residence, that includes all meals provided in the price of the lodging, and that meets all of the standards in the County Code."
92-13	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>Page AR-9, Goals, Objectives and Policies Agricultural Support Uses Policy C-AR-5b: "Storage facilities shall be permitted for agricultural products grown, prepared, or processed on-site. Comment: It is not unusual for agricultural products grown out of area to be combined with local products, for commercial purposes. Recommendation: Change to "Storage facilities, processing and promotional activities shall be permitted.....".</p>	Comment noted.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
92-14	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>Table C-AR-3 (NEW) : Row crops (cannabis) are Principally Permitted “by right”, with no permit required. Vineyards are Principally Permitted at the discretion of Permit Sonoma. Constraint “2” does not provide appeal details. The “map on file at Permit Sonoma” per which appealable areas are shown is not displayed here, nor described.</p> <p>Comment: As the LCP will determine Coastal Zone Policy for the next 20 years, it would behoove us to consider the potential water-depleting and other consequences of cannabis farming and processing, vineyards, wineries and events for both these forms of agriculture in the Coastal Zone. There are no criteria listed for discretionary permitting of wineries by Permit Sonoma. There is no mention, let alone regulatory language, re: events on agricultural lands.</p> <p>Recommendation: Prior to presentation of this Draft LCP Update to the Board of Supervisors, specific policy re: cannabis growing and processing in the Coastal Zone should be written and offered for public review.</p> <p>Likewise, Permit Sonoma criteria for discretionary permitting of vineyards and wineries and event policy for agricultural lands should be written and publicly reviewed.</p>	Commercial cannabis cultivation is not an allowed use in the May 2022 Planning Commission Draft Local Coastal Plan. See table C-AR-3
92-15	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>Page AR-11, Goals, Objectives and Policies Farmworker Housing</p> <p>Recommendation: Please add a policy prohibiting conversion of farmworker housing to visitor-serving uses.</p>	Sonoma County regulations prohibiting conversion of farmworker and affordable housing to transient occupancy apply countywide.
92-16	3/3/22	Morgan, Laura	Save the Sonoma Coast	Agriculture	Agriculture	<p>Marine Aquaculture Fishing</p> <p>Comment: Current language regarding aquaculture should be removed and replaced with Coastal Act and OPC consistent policy on aquaculture including policies regulating onshore support facilities with specific requirements of ocean water intake/discharge pipes for onshore aquaculture and—as the County controls leases to Sonoma Coast tidelands—also include policies that protect seagrass and salt marsh habitat, promote practices that reduce marine debris, restrict cultivation of non-native species, protect wildlife habitat, and address spatial conflicts with recreational and commercial fishing uses.</p>	Policy C-AR-4a: Outdoor aquaculture shall be permitted in agricultural zoning subject to a Use Permit and Coastal Development Permit.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
93-1	3/2/22	Morgan, Laura	Save the Sonoma Coast	Introduction	Introduction	<p>Page INT-2, 1 PURPOSE: Comment: "... policies related to coastal development....adopted....in General Plan 2020" inappropriately assumes development and imposes General Plan policy in the Coastal Zone. The LCP is Not Interchangeable with the Countywide General Plan: In the context of the LCP Update, General Plan 2020 is not arbitrarily transposable to the Sonoma Coast. Transmigration of some of the more concerning aspects of the Countywide General Plan into the LCP should not take place now, nor should it be enabled in the undefined future. Our coast is a unique and irreplaceable asset and deserves the kind of profound respect and due care that it was accorded during the thorough public process by which the first Sonoma County LCP was initially formulated and adopted." Recommendation: Please strike the sentence beginning "This Update... the one following: "In addition...". "This Update maintains the intent of its original authors to conserve this priceless and fragile natural resource which provides a powerful buffer against climate change. New science is included in the Elements and Policies with regard to sea level rise (2100 planning horizon), carbon sequestration, conservation of biotic resources, clean energy generation, water quality and re-charge, aquaculture, public access and geologic hazards. The issues of open space, viewscape, small coastal community preservation, public safety, appropriate housing, short-term rentals and a sustainable form of tourism are addressed. In addition, a strike-through comparison of this draft is provided." (Please provide a link here.)</p>	Comment noted.
93-2	3/2/22	Morgan, Laura	Save the Sonoma Coast	Introduction	Introduction	<p>"This updated Local Coastal Plan considers growth on the Sonoma County as projected, given historic population growth trends and anticipated increases in visitor-serving uses." Comment: Projections of growth and development in the coastal zone as presumed by previous rates of growth is no longer environmentally viable. The California Coastal Act was written 44 years ago, before climate change was generally recognized and before Bay Area population and wealth burgeoned, creating unimaginable resource and tourism pressures on the Sonoma Coast. In general, the concept of carrying capacity should apply to any new policy applied to the coastal zone, where water, open space, viewscales, affordable housing, emergency response, roads and other infrastructure are in short supply compared to demand. The 2021 Draft LCP does not reflect the reality of our times nor the necessary restraints required to conserve our coastline over the next 20 years. Recommendation: Please omit the sentence in red(QUOTATIONS) above.</p>	Comment noted.
93-3	3/2/22	Morgan, Laura	Save the Sonoma Coast	Introduction	Introduction	<p>Page INT-2 (typo-should be INT-11), 5 PUBLIC PARTICIPATION • Save the Sonoma Coast should be Save the Sonoma Coast.</p>	Page INT-11 is miss that correct organization name is "Save the Sonoma Coast".

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
94-1	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>Important missing components strongly recommended for inclusion:</p> <ul style="list-style-type: none"> -The list of Permit Sonoma's criteria for development applications requiring a Coastal Development Permit (vs a Ministerial Permit); -Standard 4-week advance public and MAC notice for CDPs, by listserve and public notices; -Minimum 4-week advance public and MAC notice for Ministerial Permits, by listserve -Required public hearings for any new housing or major remodel on the coast (as used to be the norm); -Mention of Environmentally Sensitive Habitat Areas, explicitly listed as a form of deliberate "non-human use" with reference to OSRC Element corresponding section. -A ban on the use of synthetic pesticides and rodenticides in the Coastal Zone (as successfully established in the Santa Monica LCP and Malibu) 	Administrative procedures are part of the Coastal Administrative Manual, which will be updated after certification of the Local Coastal Plan. For pesticide regulations, See Policies C-OSRC-7c through C-OSRC-7e.
94-2	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>-Page LU-4: A definition of Principally Permitted Uses is needed, as described in the Coastal Zoning Code, both in Land Use and in the Glossary;</p>	"Principally Permitted Use" definition can be found in the glossary and the Land Use Element
94-3	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>-Page LU-9, Timber: of forest values beyond timber harvest. We recommend the insertion in the right-hand margin: "In addition to provision of timber, forests are critical for essential ecological functions, such as carbon sequestration, clean air, water conservation, soil health, erosion prevention and habitat for plants, animals and fungi. Forests and woodlands also provide other human-centric benefits such as scenic views and recreation potential. These specific forest values are important to the quality of the environment and life in the County and are likewise addressed in the Water Resources Element and other sections of this Open Space and Resource Conservation Element."</p>	Comment noted.
94-4	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Vacation Rentals	<p>Vacation Rentals are displacing permanent residents. There are a variety of ethics and morals among renters as well, and bad behavior can occur. This bad behavior negatively impacts public safety and needs to be addressed.</p> <p>Our recommendations:</p> <ul style="list-style-type: none"> a) Limit the total number of vacation rentals at the Coast. b) Provide a community with the option of becoming an exclusion zone free of vacation rentals. c) Maximum occupancy rates not to exceed two persons per bedroom, plus an additional two persons. d) 24-hour management must be available. e) Each vacation rental location must demonstrate that it has adequate onsite parking on its own parcel, reliable garbage service, and noise must be controlled during quiet hours. f) The "three-strikes" principle utilized elsewhere in Sonoma County must be applied at the coast, i.e.; three verified violations at one property should lead to a one-year hiatus in vacation rental uses at that site. 	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
94-5	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>Page LU-4, Land Use Designations, Open Space (OS), Corresponding Zoning Districts: Planned Community (PC)</p> <p>Comment: Further development of Planned Communities in the Coastal Zone with the usual tennis courts and golf courses are untenable for multiple reasons (e.g., inadequate water supply, impacts on wildlife, viewscape, erosion, etc.) and should be prohibited from the coastal zone entirely. We agree with the Coastal Commission's concern that there is intrinsic adverse impact on Open Space resources by Planned Community development.</p> <p>Recommendation: Drop Planned Community Zoning from Open Space.</p>	The purpose of the designation is to designate common areas which are committed to perpetual open space in planned developments. Lands designated as Dedicated Open Space are intended to remain as common areas without structures in planned communities and planned developments. Uses allowed on Dedicated Open Space areas are limited to resource protection and passive recreation.
94-6	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>Page LU-4-5, 1.3 COASTAL LAND USE CATEGORIES, Other Permitted Uses: Comment:</p> <p>There is potential for miss-use of the category of Other Permitted Uses by undefined discretionary approval of applications, be they outright or gradual, cumulative, piecemeal approval of Uses. For enforcement purposes, the word "discretionary" is too vague.</p> <p>Recommendation: Please provide the link or full text of the Coastal Zoning Code for Other Permitted Uses. Please drop the word "discretionary".</p>	Comment noted. "Discretionary has a specific meaning in the context of the Coastal Act and the California Environment that context.
94-7	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>Page LU-6, Land Extensive Agriculture and Diverse Agriculture, Principally Permitted Use: Comment: Vineyards and cannabis grows are incompatible with coastal carrying capacity, e.g.: the Coast's Class 4 water status, further Climate Change induced drought, pesticide usage, intrinsically soil-eroding growing practices, the visual blight of hoop houses, increased traffic on Hwy 1 and the need for more emergency and law enforcement services at general taxpayer expense.</p> <p>Recommendation: Explicitly exclude cannabis-grows and vineyards and their attendant promotional activities as Ag PPU's in the coastal zone.</p>	Commercial cannabis cultivation is not an allowed use in the May 2022 Planning Commission Draft Local Coastal Plan. See table C-AR-3. Vineyard development requires a coastal development permit, which would need to find that the proposed project is consistent with the Coastal Act.
94-8	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>Page LU-8: Resources and Rural Development:</p> <p>Comment: Mining in the Coastal Zone, especially in the Cheney Gulch Mineral Resources (MR) interest area should not be allowed, given the known propensity of the area for both gully and sheet erosion and geologic instability. The associated transportation mechanisms for any produced rock, and the high visibility of any resultant mining scars from Highway One; a large cross-country automated conveyor apparatus proposed for Cheney Gulch in recent mining plans and leading to a crushed rock loading facility for transit by barges out of Bodega Bay, also poses the threat of harmful maritime slurry spills and vessel collisions in our harbor.</p>	Comment addressed in Policy C-OSRC-12b, which requires review of impacts to coastal resources, determination that the site can and will be fully reclaimed, and demonstration that an economic need exists for material produced at this site.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
94-9	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>Designation Criteria</p> <p>2. Land contains natural resources such as water, timber, geothermal steam, aggregate, or soil.”</p> <p>Comment: Mining in the Coastal Zone, especially in the Cheney Gulch Mineral Resources (MR) interest area should not be allowed, given the known propensity of the area for both gully and sheet erosion and geologic instability. The associated transportation mechanisms for any produced rock, and the high visibility of any resultant mining scars from Highway One; a large cross-country automated conveyor apparatus proposed for Cheney Gulch in recent mining plans and leading to a crushed rock loading facility for transit by barges out of Bodega Bay, also poses the threat of harmful maritime slurry spills and vessel collisions in our harbor.</p>	Comment addressed in Policy C-OSRC-12b, which requires review of impacts to coastal resources, determination that the site can and will be fully reclaimed, and demonstration that an economic need exists for material produced at this site.
94-10	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>Page LU-23: Policy C-LU-6o: Comment: Served by a mutual water system, Jenner currently has a moratorium on any further development of visitor-serving commercial facilities due to existing infrastructural inadequacies and also public safety hazards.</p> <p>Recommendation: Delete this policy.</p>	Comment noted. Policy C-LU-5o only allows expansion if water supply and wastewater requirements can be met.
94-11	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>Policy C-LU-6q: Comment: Bridgehaven is not a “resort”, but a small number of older, fragile, single-family dwellings built close to the flood level of the Russian River along Willow Creek Road, which accesses the Willow Creek portion of Sonoma Coast State Park. It is located just downstream from the confluence of Willow Creek, the last monitored anadromous fish-bearing tributary to the Russian River before it empties into the Pacific Ocean. Recreational development of this sensitive and fragile habitat is contradictory to basic principles of coastal habitat conservation.</p> <p>Recommendation: Delete this Policy.</p>	Bridgehaven Resort is located west of Highway 1 and not associated with residential development on Willow Creek Road east of Highway 1.
94-12	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>Page LU-25, Policy C-LU-2g: Comment: This policy probably violates State law, LAFCO policy, Public Health and other County policies. It does not specify that the parcel has to be contiguous to the BPUD. What uses that directly “relate to and support fishing” can’t be in the USB? A restaurant selling local fish? Boat yard? Net making? If there is a parcel that may in the future meet this criteria, name the parcel(s) by #AP and note in the LCP that applicants may apply in the future for a GP amendment, an LCP amendment and annexation to the BPUD. Otherwise, this is an invitation for endless speculation.</p> <p>Recommendation: Delete this policy.</p>	Policy C-LU-6g requires an out of service area agreement, which must be approved by Sonoma LAFCO and Bodega Bay Utility District. Because this is a change in intensity or use, the Coastal Act requires Coastal Development Permit, appealable to the Coastal Commission.
94-13	3/2/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Land Use	<p>Page LU-26, Policy C-LU-2m: Comment: Water and sewage extensions to parklands outside urban boundaries, as with Policies C-PF-2 b and e, is antithetical to the intent of the Coastal Act to protect natural resources. It invites extra-urban development. It is impractical and was taken from the GP, referring to cities with extensive sewage and infrastructure.</p> <p>Recommendation: Delete this policy.</p>	Impacts and feasibility of service extension cannot be determined in advance of site-specific studies.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
95-1	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page C-OSRC 41, 42, Mineral Resources, Policy C-OSRC-10a: "Consider areas designated by the State Mining and Geology Board as regionally significant for construction grade aggregate as priority sites for aggregate production and mineral extraction. Within the Coastal Zone, these areas are currently limited to sandstone deposits located in Cheney Gulch, approximately 2.5 miles east of Bodega Bay in western Sonoma County.2 Review requests for designation of additional areas for consistency with the Coastal Act, Local Coastal Plan, and the....." Aggregate Resources Management (ARM) Plan. (GP2020 REVISED)"</p> <p>Additionally, the project must demonstrate that and economic need exists for aggregate materials produced at the site and that full reclamation of the site is feasible and that reclamation will fully restore ecological function of the site to that which existed prior to any mining operation. (GP2020 REVISED)".</p> <p>Full reclamation as described is not physically possible. Disruptions of habitat, soils, plants, etc., are not remediable, based on current science (e.g., see Fremontia, Vol 1, #48, ETHICS OF PLANT REINTRODUCTION IN THE 21ST CENTURY, by Naomi Fraga).</p> <p>Recommendation: Drop aggregate and aggregate production from the list of protected land uses in both Land Use and the Open Space and Resource Conservation Elements.</p>	<p>Comment addressed in Policy C-OSRC-12b, which requires review of impacts to coastal resources, determination that the site can and will be fully reclaimed, and demonstration that an economic need exists for material produced at this site.</p>
95-2	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page C-OSRC 3, 1.1 PURPOSE, 1st paragraph: Comment: The opening paragraph of OSRC is out of touch with the rapidly unfolding reality of our new climate and natural world. Recommendation: Drop the words "wherever possible" in the first sentence and the words "'managed production of resources". Change to: ".....open space for the conservation and restoration of natural resources.....cultural resources". Add: "Modern Science shall provide guidelines and best practices for carbon sequestration and climate change mitigations throughout this Element."</p>	<p>Comment noted.</p>

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95-3	3/23/22	Morgan, Laura	Save the Sonoma Coast	Land Use	OSRC	<p>Page C-OSRC 3, 1.1 PURPOSE, 2nd paragraph: Comment: Currently, while lucrative for business owners, tourism in the Coastal Zone is unregulated and has adverse effects on the quality of life for both animal and human residents. Recommendation: Change first sentence to: "...Sonoma County Coast and to maintain a science-based balance of tourism activities with current and future ecosystem, residential and natural resource limitations." Add 3rd paragraph (or new policy) as enforcement: "When human activities lead to or are possible consequences of actions that may damage or harm human or other living organisms' health through the neglect, damage, destruction or elimination of individuals, populations or their habitats and physiological, behavioral, or ecological requirements, such actions shall be suspended until ample scientific evidence and ethical consideration can be applied to determine the least harmful course of action. Consideration of must be extended to future generations of all species that might be affected, regardless of any apparent physical disjunction."</p>	Comment noted. Visitor serving uses are regulated by the Local Coastal Plan, Coastal Zoning Ordinance, and provisions of the Coastal Act.
95-4	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-5, Vista Points: Comment: There are many reasons why development of vista points as described above are a bad idea for the Coastal Zone: 1) Vista points (parking lots) would themselves have a negative impact on "other coastal resources": scenic landscapes; 2) Hwy 1 is over-capacity already, with miles-long traffic back-ups on weekends and holidays. Vista Points and turn-outs would contribute to more vehicle traffic, further aggravating the situation; 3) Emergency personnel are already unable to respond to various accidents in a timely fashion due to traffic on Hwy 1; 4) "Parking areas, interpretive signs and restrooms would require grading of fragile, narrow bluff-tops and servicing of septic waste and garbage; 5) "Safe ingress and egress" would require road widening in a zone of highly erodible soils and steep bluffs. 6) Climate Change dictates a necessary reduction in vehicle miles and will put construction in areas of geologic instability at accelerated risk of erosion and bluff failure. Recommendation: Drop the section on vista points and references to them from the Element.</p>	Comment noted.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
95-5	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-6, Scenic Corridors: Comment: It is ironic that Hwy 1 is eligible for designation as a Scenic Highway, but our county has never applied for what would be an easy and certain approval. Per CalTrans, a required Corridor Protection Program for a Scenic Highway includes "visual quality protection measures that exist at the local level in five legislatively required areas: 1. Detailed land and site planning; 2. Regulation of land use and density of development; 3. Control of outdoor advertising; 4. Careful attention to and control of earthmoving and landscaping; and 5. The design and appearance of structures and equipment. Public participation in developing any new elements is very important if the program is to have popular support." Recommendation: Apply for official Scenic Highway designation for Highway 1.</p>	See Program C-OSRC-1-P1: "Request official State Scenic Highway designation for State Highway 1 throughout the Sonoma Coast."
95-6	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Criteria for Establishing Buffer Areas ATTACHMENT "M": Comment: This criterion allows for development in ESHA buffers. Recommendation: Any application specifying development in an ESHA buffer must be public and MAC-noticed and reviewed by the California Coastal Commission.</p>	Establishment of b qualified professionals, and these determinations are reviewed by the Coastal Commission.
95-7	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-14, Biotic Resources of the Coastal Zone: Recommendation: Change the first paragraph wording to: "The four main biotic resources categories represented in this section are streams and riparian corridors, wetlands, marine resources, and terrestrial habitats. Within the four main categories are many more subcategories, all of which are inter-dependent and necessary to the healthy functioning of the Coastal Zone as a whole. Included here are goals, objectives, and policies for the protection and management of such resources....."</p>	Comment noted.
95-8	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>3.2 BIOTIC RESOURCE PROTECTIONS GOAL C-OSRC-5: Recommendation: Add: "....through inventories, assessment, conservation measures, monitoring, and analysis."</p>	Policies that carry out Goal C-OSRC-7 (was C-OSRC-5) address this comment.
95-9	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Objective C-OSRC-5.1: Comment: This is an incomplete and non-specific Objective. Recommendation: Change to "....protect all native vegetation and wildlife. Specifically map occurrences of special status species, wetlands, sensitive native communities, and areas of essential habitat connectivity, including minimum 200' buffers to include areas for potential species' future movement and expansion."</p>	Policies that carry out Objective C-OSRC-7.1 (was C-OSRC-5.1) address this comment.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
95-10	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Objective C-OSRC-5.6: Comment: Biotic Resources are dwindling at a rapid rate and cannot be replaced. Recommendation: Change to: "Protection of Biotic Resources will take precedence over expansion of agricultural production, development, timber and mining operations, and other land uses."	See new Objectives C-OSRC-7.3 through C-OSRC-7.7
95-11	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page OSRC-15-16, Streams and Riparian Corridors: See the 3 paragraphs describing streams and riparian corridors. There is no mention of upslope impacts on stream hydrology, water quality, and habitat connectivity, from timber extraction, agriculture and livestock ranching. Comment: Even now, permits for timberland conversion to vineyards are being approved, with resultant siltation and pesticide run-off into tributaries of the Gualala River. Recommendation: Insert as next-to last line in first para on page 16, after "...fish and wildlife.": "Upslope impacts on stream hydrology, water quality, and habitat connectivity, including those related to timber extraction, agriculture and livestock ranching, will be reflected in Policies."	No comments for timberland conversions have been approved or are in the process of being approved within the coastal zone.
95-12	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page OSRC-17, Wetlands, 1st paragraph: Comment: Coastal wetlands have been reduced by 67% (https://defenders.org/blog/2017/08/California-s-disappearing-wetlands-face-new-perils). Recommendation: Change to: "Salt and brackish marshes and all wetlands have been reduced 67% from their historical extent and will be reduced further with climate change. They are critical habitat to restore and protect. Drop "where feasible".	
95-13	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page OSRC-17, Marine Habitats, 2nd paragraph: Recommendation: Please add: "These mudflats also contribute to Bodega Bay's designation in 2001 as an Important Bird Area (IBA) by the American Bird Conservancy, one of 500 Globally Important Bird Areas."	Recommendation will be added to description
95-14	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page OSRC-17-18, 5th Paragraph: Comment: There is insufficient description of the importance of protection of haul-out areas, which even today are subject to human and dog intrusions, with inadequate State Parks staffing to monitor the sites. Recommendation: Change to: "Stellar sea lions, protected under both the Endangered Species Act (ESA) and the Marine Mammal Protection Act (MMPA), along with California sea lions and other pinnipeds, also protected by the MMPA, haul out on offshore intertidal areas that become exposed at low tides as well as on offshore rocks.....Harbor seals, in addition to using offshore rocks along the Sonoma coast, specifically use sandy beaches at Sonoma coast locations at The Sea Ranch, Sonoma Coast State Park, Goat Rock Beach in Jenner and in the intertidal areas of Bodega Bay to rest, molt, give birth, and nurse their pups."	See Policy C-OSRC-6e, Policy C-OSRC-6f, and Policy C-PA-5e.

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95-15	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page OSRC-18, Terrestrial Habitats, 3rd paragraph: Comment: Per expert botanist Peter Warner, there are still rare native plant populations observable in our coastal grasslands. Recommendation: Please change to: "...Sonoma County's historic coastal grasslands are now considered reservoirs of habitat remnants as well as microsites supporting extant populations of rare plants."	Recommendation will be added to description
95-16	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page 18, continued, last sentence: Comment: This sentence is inaccurate, per Peter Warner. Recommendation: Change to: "Coastal prairie (historically or currently as coastal non-native annual or perennial grassland) and scrub habitats are extensive on private as well as on public lands within the coastal zone from Estero Americano north to Russian Gulch."	Description will be revised
95-17	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page OSRC-19, 3.3 ENVIRONMENTALLY SENSITIVE HABITAT, Policy COSRC-5b(1), (2): Recommendation: Add: "...law, including potential wildlife corridors, watercourses, nesting, prey habitat and mating areas."	Recommendation will be added to implementation
95-18	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Policy C-OSRC-5b(2)(10)-re:ESHA designation—"Habitats that Support Listed Species": Recommendation: Change to: "Habitats, wildlife corridors and areas that contribute to the viability of Listed Species or those of impending rarity."	Change would be c OSRC-8b
95-19	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	(11) "Tree stands that support raptor nesting or monarch populations" Recommendation: Change to: "Tree stands that support raptor and prey perching or nesting and their food sources, and/or monarch populations." Page OSRC-20, Policy C-OSRC 5b (8):	Description will be revised
95-20	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Comment: After all the protective language re: ESHA, this policy comes as a shock, approving development in ESHA with theoretical mitigation as the rationale. There is no adequate mitigation for destruction of ESHA, particularly off-site attempts to construct equivalent ESHA de-novo. Recommendation: Strike this policy as it stands. Change to: "If proposed development is a permissible use and there is no feasible alternative, including the no project alternative, that can avoid significant impacts to ESHA, then the application shall be referred to the Coastal Commission, with noticed to the MAC and the public at large. The applicant shall be informed that no further action is possible until the Coastal Commission has made a determination of the viability of the application."	The May 2022 draft policy has been reviewed by Coastal Commission staff and found consistent with the Coastal Act. Under the Coastal Act, a permit approved under this policy is appealable to the Coastal Commission.

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95-21	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Policy C-OSRC-5b(10):</p> <p>Comment: As immediately above, this policy flies in the face of previously stated ESHA protections.</p> <p>Recommendation: Strike this policy as it stands. Change to: "If the application of the policies and standards contained in this Local Coastal Plan regarding use of property designated as ESHA or ESHA buffer, including the restriction of ESHA to only resource-dependent use, would likely constitute a taking of private property without just compensation, then the application shall be referred to the Coastal Commission, with noticed to the MAC and the public at large. The applicant shall be informed that no further action is possible until the Coastal Commission has made a <u>determination of the viability of the application.</u>"</p>	The May 2022 draft policy has been reviewed by Coastal Commission staff and found consistent with the Coastal Act after revision.
95-22	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-22, Policy C-OSRC-5c(3):</p> <p>Comment: "NMFS recently completed a programmatic biological opinion in consultation with the U.S. Corps of Engineers (SF District) that encourages the use of bio-engineered bank stabilization when protecting critical infrastructure threatened by streambank erosion. Designing and implementing bio-engineered projects in accordance with the programmatic biological opinion will significantly streamline federal project permitting.</p> <p>Recommendation: Strike the word "encouraged" and replace it with "required." End with the sentence, "Design and implement bio-engineered projects in accordance with the programmatic biological opinion to significantly streamline federal project permitting."</p>	The May 2022 draft policy has been reviewed by Coastal Commission staff and found consistent with the Coastal Act after revision.
95-23	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Policy C-OSRC-5c(6):</p> <p>Comment: This policy refers to "Anadromous Fish Streams", but qualifies that terms as "Chinook and Coho Salmon Habitat". Steelhead are a federally-listed anadromous species, and as such should be included in the above qualifier.</p> <p>Recommendation: Change to "In Anadromous Fish Streams (Chinook and Coho Salmon and Steelhead) Habitat,...."</p>	See Policies C-OSRC-4g, Policy C-OSRC-4h, and Policy C-OSRC-4i.
95-24	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-23, Policy C-OSRC-5c(8):</p> <p>Comment: "Per NOAA's advisory letter to Permit Sonoma on 2/8/2017: "We request that NMFS be included as an agency "responsible for natural resource protection", and thus be afforded the opportunity, like the California Department of Fish and Wildlife, to review and provide comment on permit applications near streams or waterways."</p> <p>Recommendation: Change to: "As part of the environmental review process, refer permit applications near streams to California Department of Fish and Wildlife and other agencies responsible for natural resource protection, including NMFS. (GP 2020)"</p>	Comment noted
95-25	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>3.5 WETLANDS, Policy C-OSRC-5d(1):</p> <p>Recommendation: Add: "...marshes, ponds, seeps, reservoirs, pond edges, seasonally inundated grasslands and scrub wetlands), as well as the contiguous upslope portions of riparian habitats."</p>	Description will be revised

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95-26	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Policy C-OSRC-5d(5):</p> <p>Comment: does not specify best practices for dredging, etc., available in the Marine Sanctuary guidelines.</p> <p>Recommendation: After "Appendix E-5", insert: "Best practices for dredging, etc., shall be guided by Marine Sanctuary guidelines."</p>	Description will be revised
95-27	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-24, Policy C-OSRC-5d(6), (7):</p> <p>Comment: This policy allows for new construction with mitigations within 100' of wetlands. These are not science-based policies and do not anticipate future industry such as aqua-farming.</p> <p>Recommendation: Change to "Construction of agricultural, commercial, industrial, residential and future potential structures, such as those associated with aquaculture...Between 100 to 300 feet, unless an independent environmental assessment or qualified biologist shows the proposed activity/development would not have an adverse impact on the wetland."</p>	Buffer is a minimum of 100 feet and requires determination by a qualified biologist and review by Fish and Wildlife and Coastal Commission.
95-28	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-26, Policy C-OSRC-5e(3):</p> <p>Comment: Both of these policies are intended to protect biological resources (nesting birds on offshore rocks and disturbance of marine mammal haul outs). But there is no mechanism specified for enforcement of the prohibitions against trespass on or disturbance of these sensitive habitats. We agree with The Sea Ranch in suggesting a new policy:</p> <p>Recommendation: "Policy C-OSRC 5e (5a): Encourage the joint development of a plan by State and County Parks, USFWS, BLM and Stewards of the Coast and Redwoods for protection of these biological resources (nesting birds on offshore rocks; marine mammal haul-outs) through noticed, enforceable public access limitations."</p>	Policy will be recommended for inclusion.
95-29	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Policy C-OSRC-5e(4)(3):</p> <p>Comment: As written, this policy language is not strong enough to protect special status species.</p> <p>Recommendation: Change to: "...implemented to prevent impacts on special status species....".</p>	Comment noted
95-30	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Policy C-OSRC-5e(6):</p> <p>Comment: "Encourage" is very weak language here and ANNUAL not sufficient. Stewards currently monitors on a bi-weekly basis and monitoring should occur on a weekly basis during March-June pupping season and the August-September molting season.</p> <p>Recommendation: Change to: "Collaborate with the California Department of Fish and Wildlife to monitor Marine Mammal Haul-Out Grounds on a biweekly basis and on a weekly basis during pupping season (March through June) and molting season (August through September), in order to determine their condition and level of use and to incorporate this information into its management plan for marine mammals."</p>	Policy will be recommended for inclusion.

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95-31	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page OSRC-27, 3.7 TERRESTRIAL HABITATS, Policy C-OSRC-5f(1): Comment: The exemption of undefined ""support facilities"" is improper. Recommendation: Please define and give examples of "support facilities".	Comment noted
95-32	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Policy C-OSRC-5(5): Comment: It would be ecologically destructive to build parks and support facilities that require sand removal. Recommendation: Drop this policy.	Comment noted. It is speculative than any disturbance of sand would be ecologically destructive.
95-33	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Policy C-OSRC-5f (2): Comment: More detail is needed to account for current public practices and dog incursions into habitat. Recommendation: Change to: "On dunes/coastal strand and other sensitive areas frequented by people, carry out the following..." (2) Post signs...limiting public access, including dogs, to protect plant and wildlife communities."	Recommendation for implementation policy
95-34	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page OSRC-28, Policy C-OSRC-5f(6): Comment: Currently, we are losing native trees and woodlands at an alarming rate to development of various types, particularly viticulture and soon cannabis grows. This policy language is permissive, vague and unrealistic with regard to mitigation. Recommendation: Change to: "The removal of native trees and fragmentation of woodlands shall be prohibited without a widely noticed public hearing. Any trees removed with public consent shall be replaced...and permanent protection of other existing woodlands shall be provided in addition to replacement planting."	See Policy C-OSRC-8a
95-35	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page OSRC-29, Policy C-OSRC-5f(9): Commented [A35], Peter Benham for the CCC: "Redwoods, Douglas Fir, and other rare or important tree species should be defined as ESHA within the ESHA definition given in this chapter." We agree and would like to see this recommendation appear in the Draft.	See Policy Policy C-OSRC-8a (5)
95-36	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Policy C-OSRC-5f(10): Comment: This list of protected bird species is incomplete. Recommendation: Change to: "...near osprey, eagle and kite nests and any other threatened or endangered birds' nests, the following" Remove the word ""Osprey"" and simply state: ""Nest sites located adjacent....."	Policy revision will be recommended for inclusion

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95-37	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Page OSRC-30, Policy C-OSRC-5f(13): Recommendation: Change "minimized" to "prohibited".	Comment noted. This policy is consistent with Coastal Act Section 30240, which states: (a) Environmentally protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas. Trails are resource dependent and are not prohibited in ESHA, provided that there is no significant disruption of habitat values. Adjacent areas must also protect ESHA. The Coastal Act specifically contemplates that recreation areas can be in, adjacent to, or near ESHA, if this standard is met.
95-38	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	4 COMMERCIAL FISHING AND SUPPORT FACILITIES POLICY 4.1 BACKGROUND, Climate Change Recommendation: Please include in this section a link to the EPA's website for a modern summary of effects of Climate Change on Fisheries. Page OSRC-33, Marine Debris, State and Federal Programs:	Comment will be added to description
95-39	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	Comment: No mention is made here of a recent collaboration between Sonoma County and the Greater Farallons National Marine Sanctuary, which specifies best practices for dredging operations. Recommendation: Reference and adhere to the Marine Sanctuaries' best dredging practices document. Reference, update policies for consideration of beneficial reuse of dredge materials, and adhere to the Greater Farallones National Marine Sanctuaries Coastal Resilience Plan for Bodega Harbor (https://nmsfarallones.blob.core.windows.net/farallones-prod/media/docs/20191101-coastal-resilience-and-sediment-plan.pdf).	Comment will be added to description

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
95-40	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-37, Soil Erosion: Comment: The second sentence implies that landowners will be exempted from erosion control policy. Per NOAA letter to Permit Sonoma of 2/8/2017 in this regard: "The last sentence appears to be a non-sequitur, and does not contribute to a section that is attempting to promote and encourage soil conservation and management practices." Recommendation: When soil erosion is a potential threat such that appropriate protection measures are not "cost-effective" to a landowner, then the project in question should be denied a permit until such measures can be implemented.</p>	Descriptive sections are not regulatory.
95-41	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Objective C-OSRC-8.2: Comment: This Objective is out of date and non-specific. Recommendation: Change to: "Prevent soil erosion and restore areas damaged by erosion by bringing property owners' practices into alignment with the USDA's recommendations: (https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs144p2_063808.pdf)."</p>	Comment noted.
95-42	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-38, 6 TIMBER RESOURCES POLICY, 6.1 BACKGROUND, Timberland Resources: Recommendation: Please make this language more specific, scientific and modern: "Forests are critical for essential ecological functions, such as carbon sequestration, clean air, water conservation, soil health, erosion prevention and habitat for plants, animals and fungi. Forests and woodlands also provide other human-centric benefits such as scenic views and recreation potential."</p>	Recommendation will be added to description
95-43	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-40, Timberland Environmental Impacts Recommendation: Insert Objective C-OSRC-9.3: "Review new science on optimal forest management for habitat, carbon sequestration and fire prevention. Continuously updated guidelines can be found in Santa Cruz County's forestry management plan and https://woodlandfishandwildlife.com/wp-content/uploads/2019/12/Wildlife-Friendly-Fuels-Reduction-in-Dry-Forests-of-the-Pacific-Northwest_reduced.pdf</p>	Comment noted. A 3-5 year review of the Local Coastal Plan policies is recommended and will make sure that the best available science informs Local Coastal Plan policy.
95-44	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-41, Mineral Resources Policy Please see SSC's comments and recommendations on this subject in the Land Use Element.</p>	Please see other response regarding mineral resources
95-45	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-42, Energy Resources Policy, 8.1 Background: Comment: In general, this information is not specific to the coastal zone. It also lacks any modern scientific references. The background section does not discuss the unique situation of coastal communities. Recommendation: Please add: "In addition, coastal communities depend on imported sources of energy, including liquid fuels and electricity. They are vulnerable to energy disruptions from natural hazards such as geological events, storm surges and damage to transportation lifelines. This dependency underscores the importance of supporting enhanced independent energy initiatives in coastal areas."</p>	Comment noted

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95-46	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-45, Energy Production and Supply, Policies: Comment: This section does not discuss the current status of renewable and distributed generation applications on the coast. This data are available. There is no mention of the county's community choice agency, Sonoma Clean Power, and its impact on the shift to renewable vs fossil fuel energy supply sources. Policy recommendations encourage the development of renewables in a generic way, but there is no mention of the potential future importance of microgrids, County solar incentive programs such as PACE, etc. Recommendation: Suggest adding the following new policies: "Policy C-OSCR 12d: Encourage the development of microgrids and storage capacity to enhance the energy independence and energy security of coastal communities." "Policy C-OSCR 12e: Encourage and promote County and Sonoma Clean Power programs that provide incentives for the development and use of <u>renewable energy in the residential and commercial sectors.</u>"</p>	A policy is not required for a project or community to install microgrids or energy storage facilities consistent with protection of coastal resources.
95-47	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-46, AIR RESOURCES POLICY, Policy C-OSRC-13c: Comment: This policy transferred from an as-yet uncompleted General Plan is inappropriate for the environmentally-sensitive Coastal Zone. Recommendation: Change to: "No new sources of toxic air contaminants or foul odors shall be permitted."</p>	Comment noted.
95-48	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Implementation Programs: Recommendation: Please add a Program to keep the ecological status of the Coastal Zone monitored to avoid on-going resource-extractive activities monitored and controlled: "Initiate ecological monitoring of all recreational or other public uses of undeveloped (open space) areas, to include assessments of human carrying capacity, deleterious impacts associated with human activities (e.g., erosion, soil compaction, loss of or damage to vegetation or wildlife habitat, noise or light pollution) etc. A provision for ecological monitoring and a schedule of assessment and response to ongoing data accrual shall also be required for all extractive agricultural activities, specifically including crop production, wine grape and cannabis production (in case they manage to sneak in against our strongest recommendations!), grazing and livestock rearing and development, timber extraction, road construction, prescription fire (as much as this must be incorporated into regional vegetation management policy or any other activity) – past, current, future – with the potential to <u>render impacts to ecosystem constitution or function.</u>"</p>	Recommendation will be included in implementation program.
95-49	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC	<p>Page OSRC-48, 10.2 OTHER INITIATIVES, Other Initiative C-OSRC-2: Comment: This Initiative implies a policy of clear-cutting oaks that appear to be infected with Sudden Oak Death. Recommendation: The California Native Plant Society should be consulted on these Initiatives.</p>	Comment noted

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96-1	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC Map Recommendations	<p>ESHA Maps, 1-11, C-OSRC-2-ESHA Map Series: The original map series for ESHAs only recognized steelhead presence in the Russian River, Salmon Creek, and Estero Americano. Identified dependent steelhead populations from Spence et al. (2008) exist also in Kohlmer Creek, Fort Ross Creek, Russian Gulch, Scotty Creek, and tributaries of the Bodega Harbor. SeaGrant is also monitoring returning anadromous fish returns in Green Valley, Dutch Bill and Willow Creeks. Please make any needed corrections in your map files.</p>	The "maps" are not intended as the primary tool for evaluating coastal resource protection, but are intended as a graphic representation of policy. In the case of ESHA, the figures are not intended to be a comprehensive inventory of all ESHA due to changing habitats, future improvements in identifying ESHA, regulatory changes, and scientific discovery. The criteria found in Policy C-OSRC-8a and C-OSRC-8b determine if ESHA is present.
96-2	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC Map Recommendations	<p>Maps C-2a - 2k: These maps are at least 13 years old, not recording the acquisition of Jenner Headlands by the Sonoma Land Trust in 2009. For that reason and the acknowledged fact that the maps are not "exhaustive", they cannot be the basis for zoning, policy or enforcement. They should be exhaustive, erring on the side of greater ESHA protection, buffers and potential wildlife retreat, given the rapid loss of biodiversity with the current climate emergency. There is also no recognition or inclusion of coastal prairie, a disappearing habitat, which comprises a much larger proportion of the maps than is shown.</p>	The "maps" are not intended as the primary tool for evaluating coastal resource protection, but are intended as a graphic representation of policy. In the case of ESHA, the figures are not intended to be a comprehensive inventory of all ESHA due to changing habitats, future improvements in identifying ESHA, regulatory changes, and scientific discovery. The criteria found in Policy C-OSRC-8a and C-OSRC-8b determine if ESHA is present.
97	3/23/22	Morgan, Laura	Save the Sonoma Coast	OSRC	OSRC Recommendations	95-1 to 95-49 are SSC's OSRC recommendations.	Comment noted
98-1	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	<p>Page PF-5, 3.1 WATER SERVICES: Comment: "Generally, the coast is a water-scarce area, and land conditions are poor for septic systems. This lack of basic services limits development potential in most areas. The Sea Ranch and Bodega Bay become the main growth areas. Because the coast has a small population spread over large distances, emergency and education services are limited. It is not expected this situation will change substantially in the future." -from the 1981 LCP Nothing has improved in the way of water supply on the Coast in the past 41 years. To the contrary, with increased tourism and climate change effects on rainfall, the unregulated distribution of underground aquifers is a zero-sum game for all life forms in the Coastal Zone. Recommendation: Accept the reality of progressively limited water resources. Attempts to extend human reach into the aquifer with more expensive technology and multiple well-drilling sites is a disservice to future generations of coastal life forms, including human.</p>	

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98-2	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	<p>3.1 Water Services, 3rd paragraph: Comment: The most recent Municipal Service review of the Bodega Bay District by LAFCO was in 2004. Recommendation: Updated policy for water needs of any new development should be based on most current data and science and its potential impact on existing water resources and facilities.</p>	
98-3	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	<p>Page PF-5, Policy C-PF-2a: Comment: This policy does not clearly address how growth and development are possible, given the coastal water shortage. It also does not specify where the water will come from or how to determine that adequate capacity is "available and reserved". Recommendation: Insert"facilities exist on-site to accommodate.....". Add: "Outside Service Agreements for wastewater and septic treatment should be the last option and only if all other options for onsite disposal allowed by Public Health and the Basin plan are not feasible."</p>	
98-4	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	<p>Policy C-PF-2b:</p>	Does not appear to be a comment on the Local Coastal Plan.
98-5	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	<p>Page C-PF-6: Policy C-PF-2e: Comment: These policies differ from the last LCP radically in allowing for development outside of designated urban service boundaries. In our experience, Coastal Development Permits have not been hard to obtain. Recommendation: Delete Exception (2) altogether, outright. The current LCP template for development permits should be retained, eg: "Ensure that adequate water capacity is reserved to serve (the first three) priority developments (listed below as they are proposed in the Phase I development plan for Bodega Bay,) by requiring that if water supplies do not prove adequate to all land uses designated in the Phase I plan, a minimum of 30 percent of the projected available amount shall be reserved for the designated priority uses. Maintain the 2001 LCP's limitation of new public water and wastewater systems to within designated urban services boundaries. In cases in which several septic systems fail in a cluster, rather than extending sewer services outside urban boundaries, an invitation to sprawling development, <u>require onsite wastewater treatment systems.</u></p>	Police
98-6	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	<p>Page PF-7, Policy C-PF-2f: Comment: This policy further acknowledges that there will be discretionary development allowed outside Urban Service Areas. Recommendation: Reduce the distance for the connection to public sewage to no more than 100 feet. Change the word "limit" to the word "prevent".</p>	

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98-7	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	Policy C-PF-2g: Comment: It is clear that under these exception policies, a private property recreational concession could access urban services by declaring the development "public". Recommendation: Delete (2).	Extension of service requires a Coastal Development Permit, which would need to verify that the use is public.
98-8	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	Policy C-PF-2h: Comment: No Comment.....	Comment noted.
98-9	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	Policy C-PF-2i: Comment: This policy clearly indicates that subdivision and development are being welcomed in the Coastal Zone. Recommendation: Drop "or that the service provider will make improvements to the water or wastewater systems necessary to accommodate the new development and uses prior."	Comment noted. The policy requires adequate waster and wastewater service as a condition of approval.
98-10	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	Page PF-8, Policy C-PF-2l: Comment: The words "or other projects" are undefined and leave a loophole for development other than that of affordable housing. Recommendation: Change the first sentence to: "New privately owned package treatment plants which serve multiple uses or serve separate parcels shall be limited to the service of affordable housing only."	The policy is not intended to be limited to affordable housing.
98-11	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	Policy C-PF-2p: Comment: Per Peter Benham's comments on Land Use categories, reminding us of priorities as stated in the Half Moon Bay LCP: "3. Priority Land Uses. Define priority land uses and support development of such land uses throughout the City by the following categories: a. Coastal Act Priority Uses: Coastal-dependent uses, agricultural uses, visitor serving commercial uses, and coastal access and recreational facilities. Coastal Act Priority Uses are considered top tier priority in this LCP; and furthermore, as consistent with Coastal Act Section 30222, coastal dependent industry and agriculture take precedence over all other uses including visitor serving uses."	Coastal Commission staff recommendations have been incorporated into the 2022 Planning Commission Draft.
98-12	3/23/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Service Recommendations	Page PF-24, 11.2 OTHER INITIATIVES, Other Initiative C-PF-1: Recommendation: Utilize CDWR and County Water Board guidance in formulating any aquifer estimates and long-term sustainability of local water supplies.	Program C=PF-1 wi and use budget for the coastal zone, and will specifically evaluate adequacy of individual water districts. Information will be updated every 5 years.
99-1	2/16/20	Charter, Richard	The Ocean Foundation	Land Use	Biotic Protections	The Caltrans Highway One realignment which includes an elevated ten foot wide bridge crossing Scotty Creek would cause unnecessary intrusion on the habitat. The site needs careful design review as to not impact the watershed in a detrimental way.	Project has been approved by the Coastal Commission and will open in December 2022.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
99-2	2/16/20	Charter, Richard	The Ocean Foundation	Land Use	Biotic Protections	In 2019 there was a federal Five-Year OCS offshore drilling plan. The plan is currently on hold, but after 2020 it is expected to advance rapidly. A ballot measure protecting the Sonoma Coast was adopted in 1986. A broader interpretation of the onshore facilities language should be undertaken in the LCP Update to protect lands along our coast that would otherwise be vulnerable to subsea cable landfalls, new onshore electrical switchyards and distribution substations, and onshore staging areas for the offshore floating wind industry now being planned in federal waters lying off of counties to our north.	See Policy C-LU-3a and C-LU-3b
99-3	2/16/20	Charter, Richard	The Ocean Foundation	Land Use	Public Access	The LCP should take these MPA's into account in terms of shoreside land use planning. The LCP Update needs to also incorporate consideration of the elements of the California Coastal National Monument that lie along the Sonoma Coast, including the appropriateness of proposed shoreline public access points for that National Monument along our coast.	See Open Space an Element Section 6 "Marine Habitats". Policies in the Public Access Element require access points to avoid impacts to natural resources, including ocean resources.
99-4	2/16/20	Charter, Richard	The Ocean Foundation	Land Use	Vacation Rentals	Vacation Rentals can negatively impact public safety because of differing morals or values. a) Limit the total number of vacation rentals at the coast. b) Provide a community with the option of becoming an exclusion zone free of vacation rentals. c) Maximum occupancy rates not to exceed two persons per bedroom, plus an additional two persons. d) 24-hour management must be available. e) Each vacation rental location must demonstrate that it has adequate onsite parking on its own parcel, reliable garbage service, and noise must be controlled during quiet hours. f) The "three strikes" principle utilized elsewhere in Sonoma County must be applied at the coast, i.e.; three verified violations at one property should lead to a one-year hiatus in vacation rental uses at that site.	These standards are included in the Vacation Rental Program that will amend the Coastal Zoning ordinance to allow regulation of Vacation Rentals. This is not part of the Local Coastal Plan Update.
99-5	2/16/20	Charter, Richard	The Ocean Foundation	Land Use	Principally Permitted Use	The consistent administrative treatment of all Coastal Permit applicants, without the present practice of granting of biased access gained through retaining expensive consultants who are sometimes former County staff, must particularly apply to inappropriate proposals for rural commercial event centers in agricultural settings and to all other threats to conservation lands, safe communities, and open space protection.	Land Use Element policies have been strengthened to provide clear guidance and minimize inconsistent administrative practices.
99-6	2/16/20	Charter, Richard	The Ocean Foundation	Land Use	General Plan Consistency	In the context of the LCP Update, General Plan 2020 is not arbitrarily transposable to the Sonoma Coast. Transmigration of some of the more concerning aspects of the Countywide General Plan into the LCP should not take place now, nor should it be enabled in the undefined future. Our coast is a unique and irreplaceable asset and deserves the kind of profound respect and due care that it was accorded during the thorough public process by which the first Sonoma County LCP was initially formulated and adopted.	Comment noted.

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99-7	2/16/20	Charter, Richard	The Ocean Foundation	Land Use	Housing	The LCP draft opens the door to random conversion of commercial fishing-related residential opportunities into what the General Plan calls "affordable housing", which would not longer, as we interpret the preset public view version of the document, need to be prioritized for fishing families as before.	Coastal Act section Policies found in Land Use Element Section 4 "Affordable Housing" provide affordable housing needed by many workers in the coastal zone, not just fishing families
99-8	2/16/20	Charter, Richard	The Ocean Foundation	Land Use	Biotic Protections	On rodenticides: Compounds that already have been precluded from retail sale in the State of California should not be used within the Coastal Zone of Sonoma County. In this regard, Malibu has recently adopted language in their own LCP that should be customized for adoption in the Sonoma County LCP. Neighboring Marin County has a well-established Integrated Pest Management Plan, parts of which can serve us as a ready model in Sonoma County.	Addressed in Policy C-OSRC-7c
99-9	2/16/20	Charter, Richard	The Ocean Foundation	Land Use	OSRC	The County of Sonoma needs to stop consenting to CalFire's free reign over review and approval of proposed Timber Harvest Plans (THP's), particularly in the Coastal Zone. The County should also be the final arbiter of vineyard conversions of forestland, as well as standing as the primary responsible steward in protecting our hypersensitive riverine floodplain habitats.	Timberlands in the Sonoma coastal zone are Coastal Commission Special Treatment Areas and subject to provision of California Code of Regulations Title 14, § 921. Coastal Act section 30106 defines a timber harvesting plan submitted pursuant to the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 as development and a coastal development permit is required.
99-10	2/16/20	Charter, Richard	The Ocean Foundation	Land Use	Historic Preservation	More of our coast's smaller coastal residential communities should be treated as historic preservation districts in which incompatible or intrusive structures are discouraged, and as places where appropriately-scaled buildings of compatible design should be prioritized. Otherwise, we will continue to incrementally lose the character of our coastal communities, one street and one building at a time.	See Cultural and Historic Resources Element Objective C-CH-1.2 and Policy Policy C-CH-1b for measures that protect against future loss of historic character and resources.
99-11	2/16/20	Charter, Richard	The Ocean Foundation	Circulation and Transit	Transportation	The updated LCP should pay more attention to exploring appropriately-sited left-turn lanes, intelligent traffic and visitor parking management, and alternative transportation modes, lest clogged rural transportation routes that were originally designed to accommodate horse drawn wagons unsurprisingly come to a halt on many busy holiday weekends. While we all love bicycles and support their use for healthy coastal access, planning policies that can eventually relocate the increase in bicycle traffic off of our narrow, shoulder-free, Coast Highway One wherever possible, in the interest of both bicycle and vehicular public safety, should be a higher priority in the LCP Update	Policies C-CT-3l, and C-CT-3q require planned bicycle facilities to be incorporated into all road maintenance and improvement projects. Policy C-CT-3r requires private development project to construct bicycle and pedestrian facilities where a nexus exists to the project.
99-12	2/16/20	Charter, Richard	The Ocean Foundation	OSRC	Public Access	In summary, the current update of the LCP should continue to integrate the input of coastal communities, organizations, and local citizens into the review and revision process in order to produce a comprehensive Local Coastal Plan Update that truly protects our coast and one that works in the best interests of the people and places of Sonoma County and their global constituency.	Comment noted.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
100	01/08/2007	California Coastal Commission	California Coastal Commission	Land Use	Biotic Protections	Letter from the CCC to Bill Dutra regarding quarry expansion project. Reemphasizes earlier stance-- the adverse impacts to the habitat and basically all other elements make this project something that will never be approved. The project is something that is not approval consistent with California coastal resource protection policies.	A Coastal Developm to reopen the Cheney Gulch gravel mine. The approval process will require full environmental analysis.
101-1	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	Rationale: When the 2019 Noise Element was deleted from the 2021 draft, important information regarding the effects of noise on people and accompanying policy was deleted. This should be recovered. Effects of "anthropogenic" (man-made) noise on people themselves is unaddressed in the 2021 Draft LCP. Recommendation: Re-instate the 2019 LCP Draft Noise Element in the LCP Draft.	Noise Element has been removed from the Local Coastal Plan.
101-2	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	Rationale: According to Arthur Popper, PhD, editor of Acoustics Today, this is one of the most science-based and user-friendly community noise policies in the United States. Recommendation: review and incorporate the model noise ordinance applying to Montgomery County, Maryland (https://www.montgomerycountymd.gov/DEP/contact/noise.html).	Comment noted.
101-3	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	Rationale: There has been much research done worldwide in the rapidly emerging field of human-caused noise and vibration effects on animals. Because the LCP will determine coastal policy for the next 20 years, we request that Permit Sonoma staff with wildlife ecology training and experience review the text and journal mentioned above on an annual basis. New science relevant to sound and vibration effects on terrestrial and marine wildlife may then inform them of any necessary amendments to the LCP Noise Policy. Recommendation: Permit Sonoma staff with wildlife and ecology training and experience review "Effects of Anthropogenic Noise on Animals", a 2018 co-publication of Springer and the Acoustical Society of America, and the international journal "Acoustics Today" annually.	Noise Element has been removed from the Local Coastal Plan.
101-4	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	Recommendation: Under section 1.3 in the Noise Element, include "ESHAs" as noise-sensitive areas (rather than as a "use").	Noise Element has Coastal Plan.
101-5	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	Recommendation: Under section 2.2.1, add "(6) Construction" and "(7) Manned and Unmanned Aircraft (Drones)".	Noise Element has Coastal Plan.

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101-6	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	<p>Recommendation: Add Section 2.3 to the Noise Element: "Noise and Its Effects on Animals and Habitat".</p> <p>We suggest paraphrasing "Why Sounds Matter", from the Point Reyes National Seashore website (https://www.nps.gov/subjects/sound/soundsmatter.htm) as both rationale and introduction: "Natural sounds are part of the resources vital to coastal ecosystems. Such sounds comprise communication critical for wildlife in natural habitats, an immersive experience for visitors and a peaceful environment for residents. Animals depend on hearing natural sounds in the environment for a range of activities, including:</p> <ul style="list-style-type: none"> • Communication • Establishing territories • Finding habitat • Courting and mating • Raising families • Finding food and avoiding predators • Protecting their young" 	Noise Element has been removed from the Local Coastal Plan.
101-7	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	<p>Rationale: Scientific evidence has demonstrated a clear pattern of potential harm to every species of marine or terrestrial animal by excessive noise.</p> <p>Recommendation: Add to GOAL C-NE-1: "Protect people, animals, environmentally sensitive habitat, and land uses from the adverse effects of exposure to excessive noise...."</p>	Noise Element has been removed from the Local Coastal Plan. See policies Policy Policy C-LU-1d and C-LU-1e.
101-8	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	<p>Rationales: Wildlife and habitat require similar protection as people do from the potential deleterious effects of noise and vibration : https://www.researchgate.net/profile/Rouven-Schmidt/publication/337401780_The_effects_of_anthropogenic_noise_on_animals_a_meta-analysis/links/5ddaec4458515dc2f4b699a/The-effects-of-anthropogenic-noise-on-animals-a-meta-analysis.pdf?origin=publication_detail</p> <p>Recommendation: Add "Objective C-NE-1.5: "Protect the unique sound environment of the rural coastal zone to sustain a healthy coastal ecosystem and quality human experience there for future generations."</p>	Noise Element has been removed from the Local Coastal Plan.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
101-9	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	<p>Rationale: During direct communication with Arthur Popper, PhD, editor of Acoustics Today on November 2, 2021, we learned that the shifting research and technological environment with regard to noise and vibration effects on wildlife requires utilization of the Precautionary Principle rather than premature statements of policy. The article above was also recommended as a reference by Dr. Popper.</p> <p>Recommendation: In place of Policy, Objective C-NE-1.5 continues: "In temporary lieu of research-based, specific, protective Policy with a to effects of noise and vibration on multiple species of wildlife, the Precautionary Principle will be followed:"</p> <p>"The precautionary principle in modern environmental science is the guideline for environmental decision making and has four central components: taking preventive action in the face of uncertainty; shifting the burden of proof to the proponents of an activity; exploring a wide range of alternatives to possibly harmful actions; and increasing public participation in decision making (https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1240435/)."</p> <p>Include as reference, "Soundscape Ecology of the Anthropocene", by Hans Slabbekoorn, PhD, from "Acoustics Today" Spring, 2018 (https://acousticstoday.org/soundscape-ecology-anthropocene/).</p>	Noise Element has been removed from the Local Coastal Plan.
101-10	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	<p>Rationale: This is current Greater Farallones Marine Sanctuary regulation for our coastline.</p> <p>Recommendation: Add "Policy C-NE-2f: Overflight altitudes shall be no lower than 1000 ft. elevation over the coastal zone."</p>	Noise Element has been removed from the Local Coastal Plan. Coastal Act does not have authority to regulate aviation.
101-11	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	<p>Rationale: This is current Sonoma Coast State Parks regulation, which governs similar and adjoining habitat to rural and open space areas of the coastal zone.</p> <p>Recommendation: Add "Policy C-NE-2g: Unmanned aircraft (drones) shall not be flown over ESHAs."</p>	Noise Element has been removed from the Local Coastal Plan.
101-12	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	<p>Rationale: Objectives 1.1 and 1.2 are duplicate.</p> <p>Recommendation: Change in "The following policies shall be used to achieve these objectives:" to "The following policies shall be used to achieve objectives C-NE-1.1 through C-NE-1.3."</p>	Noise Element has been removed from the Local Coastal Plan.
101-13	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	<p>Rationale: This policy assumes permitting of races or concerts 6 days per year with attendant increased noise allowances. This would be fitting for the General Plan but not the Coastal Zone.</p> <p>Delete Policy C-NE-1c(4)</p>	Noise Element has been removed from the Local Coastal Plan.
101-14	1/13/22	Morgan, Laura	Save the Sonoma Coast	Noise	Noise Element	<p>Rationale: This Policy recommends treatment of open space as a noise buffer. This would be fitting for the General Plan but not the Coastal Zone.</p> <p>Delete Policy C-NE-1c (5)(b)</p>	Noise Element has been removed from the Local Coastal Plan.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
102-1	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	The population projection on page 3 of the 2019 Draft, all the public has been given access to, is excessive and drives much of the development language in this Element. It should be lowered, as should be the development emphasis. ("The amount of land shall be consistent with the population projected.....". There is a major discrepancy between the population increase projected by the "General Plan for the Sonoma Coast", which is itself an inappropriate application, of "11,700 new residents by 2020" and the total population of 3,359 projected by Permit Sonoma GIS Community Profile for 2023);	The Local Coastal Plan is a policy document, and not intended as a comprehensive inventory of current demographic information and data.
102-2	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	Inappropriate conversions, amendments and inordinate discretionary powers by Permit Sonoma have lead to development out of keeping with directives by the California Coastal Commission. Applications for Local Coastal Plan Amendments have been approved by Permit Sonoma, correlated to financial incentives accrued by the department under the provision of "At Cost" assistance by planners to wealthy developers. This historically leads to both falsification of information given to the Commission, resulting in "de minimus" designation, or project approval against Coastal Commission directives. The built-in incentive to abet development along with Permit Sonoma discretionary power should be abolished for the sake of defined Coastal Zone resource conservation. Additionally, applications should be publicized as they are filed, along with disclosure of all communications and billings between developers and PS staff with real-time participation by the public and the CCC.	Comment noted. Opinion that staff is influence by wealthy developers is speculative and not actionable.
102-3	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	The Land Use maps are very old (20-25 years) and are no longer accurate;	The land use maps representation of the Local Coastal Plan land use policies
102-4	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	New development, including land divisions, for a non-priority use is already anticipated, as is evidenced by Appendix A. Discretionary new development should be prohibited, whether or not there is theoretical water and wastewater capacity for it, let alone providing additional water (Policy C-LU-4c). As the effects of climate change escalate, so does the need for groundwater and biotic conservation and prevention of erosion and groundwater contamination. Emergency services and roadway transportation are already inadequate to serve the needs of coastal residents and visitors.	Comment noted. Impacts are evaluated at the project level.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
102-5	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	Bodega Bay has insufficient water for high-density housing and should not be subject to more well-drilling in a known zone of extremely scarce groundwater ("Adequate water, sewer, public safety, park, school services, and other necessary infrastructure are available or planned to be available.") This language is an open door for inappropriate development approval.	Policies in the Public Facilities & Services Element require service providers to prepare a master facilities plan establishing there is adequate capacity to serve current and future needs.
102-6	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	There should be early (eg, prior to full application) MAC, general public and Coastal Commission notification and public vote on any developments proposed within areas of Principally Permitted Use;	Projects are not ac application, and notice cannot be provided on a speculative basis.
102-7	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	Under the broad definition of "resource-dependent", even an activity as destructive as aggregate mining could theoretically be approved in ESHA. Clearing of vegetation, grading, excavation, fill or construction, even for resource-dependent uses, should be prohibited in ESHA;	Damage to coastal resources, including ESHA is prohibited by numerous policies.
102-8	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	Development of Planned Communities in the Coastal Zone with tennis courts and golf courses is untenable for multiple reasons (eg, inadequate water supply, impacts on wildlife, viewscape, erosion, etc.) and should be prohibited from the coastal zone entirely;	Comment noted. Impacts are evaluated at the project level.
102-9	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	Onshore support facilities for any form of offshore energy generation, such as wind and wave, in addition to offshore oil or gas exploration and development, should be prohibited in the coastal zone.	See Policy C-LU-3b.
102-10	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	There are no over-arching guidelines limiting urban or commercial service area boundaries. Zoning constraints to determine boundaries must be provided to avoid inappropriate use permits.	Urban service Area areas served by public water and wastewater services, including on-site wastewater management distri
102-11	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	Preserve and enhance affordable housing opportunities on the Sonoma County coast by enforcing a moratorium on vacation rentals until such time that no more than 20% of housing is for vacation rental use. (Santa Cruz LCP language, approved by the Coastal Commission).	Policy in LCP does n concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
102-12	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	Regulate vacation rentals specifically: One off-street parking spot per bedroom and 2 cars maximum per bedroom in vacation rental properties shall be required in residential areas to reduce traffic congestion and GHG (Trinidad LCP), unless neighborhood covenant rules have stricter parking rules in which case those parking regulations apply; a sign of not more than 3 by 3 feet shall be required on vacation units with phone number and contact information for complaints (Santa Cruz LCP); to support climate change impacts associated with tourism and affordability for residents/workforce, minimum rental shall be for 7 days. (Solano Beach has 7 days, Imperial County has a 30 day minimum for vacation rentals). All vacation rentals shall be licensed and regulations enforceable by means of fines (California Senate Bill 1049 allows cities to fine rental hosts up to \$5000 per violation.) Property owners/management that have repeated violations shall have their license revoked for not less than one year.	Policy in LCP does not restrict overall number or concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
102-13	1/13/22	Morgan, Laura	Save the Sonoma Coast	Land Use	Development	Require that "affordable housing" be reserved and maintained at low cost for occupancy by commercial visitor service workers who heretofore have been required to commute long distances to work. The suggested Housing Opportunity Area south of old town Bodega Bay refers to land developed illegally by RJ Battaglia for expensive vacation rentals, not truly affordable housing. Further permits with for this individual's projects should be curtailed.	Comment noted. Affordable housing is a needs based program with strict controls in state and federal law. Speculation regarding legality of land development is not actionable.
103-1	1/13/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Public Access	Policy C-PF-2d: -is incomplete and confusingly written	Comment noted.
103-2	1/13/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Public Access	Page 7, Policy C-PF-2g: "Public park and recreational facilities" are not defined. There is concern that private landowners could access public services for privately developed recreational concessions open to the public. Terms should be clearly defined here or in the Glossary to avoid that possibility,	A definition will be added to the Glossary
103-3	1/13/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Public Access	Page 9, Policy C-PF-2p: for example: -Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development in accordance with California Coastal Act Sections 30222 and 30254. The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority consistent with coastal priority land uses of the Coastal Act. (NEW)	See Table C-LU-1 for land use priorities.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
103-4	1/13/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Public Access	<p>Pages 9 and 10: -Further Park and Recreation Facility Development are being encouraged and planned. Anticipated tourism and recreational growth puts the cart before the horse. These goals, objectives and policies are in support of a mistaken premise—that the Sonoma County Coastal Zone has an unlimited capacity for recreational development. It does not. Its unique qualities are already being degraded by recreation and tourism in excess of its public safety, transportation, facilities and services carrying capacity. Rather than increasing development to meet population growth and demand, it is time to safely steward coastal resources and more carefully manage the amount of recreational use we already have (eg, many pounds of garbage and even human feces were left on Doran Beach in the aftermath of the 2018 4th of July fireworks event, per Patty Ginocchio).</p>	Comment noted.
103-5	1/13/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Public Access	<p>Page 15: Policy C-PF-5d: -Inadequate fire and emergency services in the coastal zone are still not clearly addressed: “Support actions, including consolidation of fire districts and increased tax revenue that will provide sustainable fire protection and emergency medical services. Identify funding opportunities that will require visitor serving uses to provide support.” -Sonoma County Coastal zone tourism generates more TOTs than any other region in the County but the revenue is not returned commensurate with the need for basic public safety services.</p>	Consolidation of fire improve service delivery and increase funding opportunities. Programs C-PF-5-P1 through C-PF-5-P3 are intended to identify funding and improve service.
103-6	1/13/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Public Access	<p>Page 18, Policy C-PF-7: -Application of biosolids policy must include US EPA listed criteria, eg: “Sufficient land to provide areas of non-application (buffers) around surface water bodies, wells, and wetlands; Depth from the soil surface to groundwater equal to at least one meter; Soil pH in the range of 5.5 to 7.5 to minimize metal leaching and maximize crop growing conditions;”etc..</p>	Specific standards for application will be part of the implementation program.
103-7	1/13/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Public Access	No solid waste facility should be visible or smelled in the Coastal Zone.	Comment noted.
103-8	1/13/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Public Access	<p>Page 19, Policy C-PF-2a, p 19: -To close potential loopholes for leap-frogging new development, as in: “Development, including land divisions, shall be prohibited unless adequate water and wastewater treatment and disposal capacities and facilities exist to accommodate such development.”, we recommend inserting the words “on-site” between “unless” and “adequate”. -And to prevent a proliferation of Outside Service Agreements, we further recommend adding language that “OSAs should be the last option and only if all other options for onsite disposal allowed by Public Health and the Basin plan are not feasible.”</p>	Policies in the Water & Services Elements restrict outside service agreements to abating a public health risk, such as a failing septic system, that is created by existing development.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
103-9	1/13/22	Morgan, Laura	Save the Sonoma Coast	Public Facilities	Public Access	<p>Page 24, Other Initiative C-PF-1: -The pervasive water shortage in the coastal zone should be noted and integrated into policy regarding any future development. The most recent Municipal Service review of the Bodega Bay District by LAFCO was in 2004: "Updated policy for water needs of any new development should be based on most current data and science and the impact on existing water resources and facilities."and should include this language: "Utilize CDWR and County Water Board guidance in formulating any aquifer estimates and long-term sustainability of local water supplies." 1.1 2nd paragraph: The current traffic congestion [on] ALONG the coast has resulted from a combination of factors. Regional factors include growth in employment and population [primarily within Sonoma County's cities]. Local factors include increases in parkland ATTRACTIONS [acreage through expansions, acquisitions, and dedications]; in the number and length of trails and associated hiking opportunities; in access to the beach and ocean; and lack of public transportation. [Most importantly,] The public HAS FEW ALTERNATIVES TO [continues to prefer] the automobile as the primary means of transportation.</p>	The Water Resources Element contains policies related to protecting the limited groundwater resources in the Coastal Zone.
104-1	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	<p>2.1.1 3rd paragraph: Sonoma Coast State Park and Sonoma County public beaches are among the most visited parks northwestern California, generating significant weekend traffic congestion. With limited public transportation and lack of safe bicycle routes, most people HAVE BEEN [are] obligated to drive in order to enjoy the Sonoma Coast.</p>	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" and Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-2	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	<p>2.1.1 3rd paragraph: Sonoma Coast State Park and Sonoma County public beaches are among the most visited parks northwestern California, generating significant weekend traffic congestion. With limited public transportation and lack of safe bicycle routes, most people HAVE BEEN [are] obligated to drive in order to enjoy the Sonoma Coast.</p>	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" and Section 4 "Transportation System Carrying Capacity and Safety Policies".

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
104-3	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Roadway Capacity and Conditions: DUE TO THE [With] narrow shoulders, LIMITED [inadequate] sight lines, and limited opportunity for safe e passing, improving THE ADHERENCE TO SAFE SPEED LIMITS [road safe ety] is the primary concern along the entire length of Highway 1.	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" and Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-4	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Transportation Improvements, 1st paragraph: MORE THAN THREE DECADES HAVE PASSED SINCE THE [In the 1985] Calif ornia Department of Transportation (Caltrans) Route Concept Report Summary on State Highway 1, RECOMMENDED ROADWAY IMPROVEMENTS, BUT ONLY A FEW HAVE BEENFUNDED AND BUILT. [Caltrans identifies the f allowing potential roadway safety improvement projects: shoulder widening, passing lanes, channelization and intersection improvements to enhance turning mov ements, additional parking areas where unsafe e parking conditions currently exist, and features that would minimize roadside parking on the highway. Safety improvements to State Highway 1 constructed since the last Local Coastal Plan Updatein 1995 include lef t turn lanes at The The Sea Ranch, at the intersection with State Highway 116 near Jenner, near The Tides restaurant, and at the Bodega Harbour Subdivision. Other	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" and Section 4 "Transportation System Carrying Capacity and Safety Policies".

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
104-5	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	1st paragraph: SHOULD FUNDING BECOME AVAILABLE, providing turning lanes at intersections and parking areas is the most effective approach to improving the SAFETY [capacity] of State Highway 1 while maintaining it as a two lane scenic highway. Addition of turning lanes provides considerable safety benefits as well as reducing traffic delays in Jenner, Bodega Bay , and near public beaches.	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" and Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-6	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	1st paragraph: Minor road improvements in the community of Bodega Bay will not relieve traffic congestion, and establishing a bypass route has proven infeasible. While capacity along this section of State Highway 1 will remain LIMITED, [inadequate,] there are MANY opportunities to improve [pedestrian] safety and reduce dependency on automobiles for [local] trips OF LESS THAN 3 MILES by adding pedestrian walkways, INTRODUCING SHARED ELECTRIC BICYCLE OPPORTUNITIES, restricting turning movements across traffic, and reducing vehicle speeds.	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" and Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-7	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	2nd paragraph: Reducing speed limits is the most practical way to SHOULD FUNDING BECOME AVAILABLE, providing turning lanes at intersections and parking areas is the most effective approach improve the SAFETY capacity of State Highway 1 while maintaining it as a two lane scenic highway . Addition of turning lanes might provides considerable safety benefits as well as reducing traffic delays in Jenner, Bodega Bay, and near public beaches.	Comment noted.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
104-8	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	<p>3rd paragraph: Other safety improvements THAT HAVE BEEN proposed for State Highway 1 are SIGNAGE TO ALERT MOTORISTS TO PEDESTRIANS AND CYCLISTS, selective widening and road alignments; parking management, development and enforcement programs; [and other types of road improvements such as] roadway striping and marking, bicycle lanes and pedestrian ways. Improvements to State Highway 1 such as construction of bicycle paths or widening of shoulders will be necessary to construct the Sonoma County segment of the California Coastal Trail (see discussion below).</p>	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" and Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-9	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	<p>5th paragraph: Minor road improvements in the community of Bodega Bay will not relieve traffic congestion, and establishing a bypass route has proven infeasible. While capacity along this section of State Highway 1 will remain LIMITED, [inadequate,] there are MANY opportunities to improve [pedestrian] safety and reduce dependency on automobiles for [local] trips OF LESS THAN 3 MILES by adding pedestrian walkways, INTRODUCING SHARED ELECTRIC BICYCLE OPPORTUNITIES, restricting turning movements across traffic, and reducing vehicle speeds. AT PRESENT, MINIMAL public transit is provided by Mendocino Transit Authority and Sonoma County Transit. Mendocino Transit Authority operates bus route 95, which is the only year-round transit service along the Sonoma Coast. Service is CURRENTLY limited to a single daily trip running southbound to Santa</p>	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" Section 3 "Bicycle and Pedestrian Policies", and Section 4 "Transportation System Carrying Capacity and Safety Policies".

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
104-10	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	3. Circulation and Transit System Policy: 3.1 General Transportation Policies Goal C-CT-1: It is critical to reduce dependence on automobiles, both to maintain the scenic qualities of Highway 1, and to improve safety for cyclists and pedestrians.	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" Section 3 "Bicycle and Pedestrian Policies", and Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-11	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Objective C-CT-1.1: It would be better to state that: "The most likely way to initiate basic funding for much-needed public transit and shuttle services would be to establish an equitable public and private parking reservation system for the vicinity of Jenner, taking lessons from the parking reservation system and private and public shuttles that now serve Muir Woods. https://Marin.org/sites/default/files/inline files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf Such a system could be developed for destination parking areas that fill up most quickly on high-visitor days. An experienced public or private entity with a diverse advisory board representing public and private entities that own parking spaces, as well as visitors, residents, and	Muir Woods is a federal facility and is not subject to the Coastal Act policies regarding access. The Coastal Commission views reservation systems as inconsistent with the Coastal Act requirement to provide public access.
104-12	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	"Because the cost of needed improvements to the circulation and transit system are likely to range from \$10 million to \$30 million per year, launch projects that will increasingly attract Federal and State grants to supplement local fees, taxes, and bonds."	Comment noted.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
104-13	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	<p>It would be better to state that: " The most likely way to initiate basic funding for much-needed public transit and shuttle services would be to establish an equitable public and private parking reservation system for the vicinity of Jenner, taking lessons from the parking reservation system and private and public shuttles that now serve Muir Woods. https://Marintransit.org/sites/default/files/inline-files/060519%202018%20Muir%20Woods%20Shuttle%20Report_1.pdf Such a system could be developed for destination parking areas that fill up most quickly on high visitor days. An experienced public or private entity with a diverse advisory board representing public and private entities that own parking spaces, as well as visitors, residents, and employees of coastal entities, could administer such a system.</p>	Muir Woods is a federal facility and is not subject to the Coastal Act policies regarding access. The Coastal Commission views reservation systems as inconsistent with the Coastal Act requirement to provide public access.
104-14	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	<p>Objective C-CT-1.2: There are limits to expansion of the road network and parking areas can not reasonably be expanded to support rising numbers of automobiles visitors. Therefore, it is important to:</p> <p>(see change) Develop a convenient and reliable system of public and private buses, shuttles, TNC services, vans, bikeshare services, and pathways that will make it practical and attractive for increasing numbers of visitors to park automobiles at inland locations.</p>	See Programs C-CT-2-P1 and C-Ct-P2.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
104-15	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Objective C-CT-1.3: Because the Air Resources Board Staff has predicted that California's vehicle miles traveled must be reduced by 25% by — reductions at the rate of about 1%per year in vehicle miles traveled are most likely to be required for the Local Coastal Zone. The objective must be: "Steadily reduce vehicle miles traveled as well as greenhouse gas emissions to comply with State and regional requirements."	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" Section 3 "Bicycle and Pedestrian Policies", and Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-16	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Objective C-CT-3 cont.: Because the Governor's Office of Planning and Research has recognized that California's vehicle miles traveled per capita must be reduced, declines at the rate of about 1%per year are likely to be required for the County and the Local Coastal Zone should assume a similar requirement. Calif. Office of Planning & Research, Technical Advisory on Evaluating Transportation impacts in CEQA, Dec. 2018, p.2: . . . to achieve the State's long-termclimate goals, California needs to reduce per capita VMT. This can occur under CEQA through VMT mitigation. Half of California's GHG emissions come fromthe transportation sector 3 , therefore, reducing VMT is an effective climate strategy, which can also result in co-benefits. 4 Furthermore, without early VMT mitigation, the state may follow a	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" Section 3 "Bicycle and Pedestrian Policies", and Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-17	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Objective C-CT-1.3 cont: SB 375 and the Air Resources Board call for California's vehicle miles traveled to per capita must be reduced, by about 25% at the rate of about 1%to 3%per year in order to achieve carbon neutrality by the year 2050. Plans f or are likely to be required for the County and the Local Coastal Zone will should assume a similar requirement be consistent with this trend.	See Circulation & T "Transit and Automobile Trip Reduction Policies" Section 3 "Bicycle and Pedestrian Policies", and Section 4 "Transportation System Carrying Capacity and Safety

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
104-18	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Object C-CT-1.5: Since automobile travel is sensitive to pricing and the attractiveness of alternatives such as cycling and walking, the emphasis should be to: "Reduce the use of automobiles by the work force through a jobs/housing balance of approximately 1.5 jobs within walking and cycling distance of each year-round residence, and by assuring access to a safe network of bicycle-pedestrian pathways."	See Circulation & T "Transit and Automobile Trip Reduction Policies" Section 3 "Bicycle and Pedestrian Policies", and Section 4 "Transportation System Carrying Capacity and Safety
104-19	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Objective C-CT-1.6: Within the Coastal area, the objective should be to "Encourage projects that are designed to encourage active transportation, such as the use of pathways, bicycles, vans and shuttles."	See Circulation & Transit Element Section 2 "Transit and Automobile Trip Reduction Policies" and Section 3 "Bicycle and Pedestrian Policies".
104-20	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-1b: Because the best way to reduce driving is to make drivers aware of the costs, this policy should be to: Require all new developments and all significant improvements to existing developments to unbundle parking costs so that users who bicycle, walk, or use transit are not required to pay for parking.	The Coastal Act and the Coastal Commission do not support paid parking in the coastal zone unless associated with campgrounds or improved areas.
104-21	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Goal C-CT-2: Because State law as well as regional policies require vehicle miles traveled to be steadily reduced, this goal should state: "Decrease vehicle miles traveled by approximately 1% per year, and provide for increasingly attractive alternative means of travel to and within the Coastal Zone."	Policies in support of this goal are challenging to implement as most trips are generated outside of the coastal zone. VMT reduction in the coastal zone will require a regional approach through MTC and Sonoma County Transportation Authority.
104-22	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Where is C-CT-2.6?	Typographic numbering error noted.
104-23	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Objective C-CT-2.10: Because some roads are currently unsafe for cyclists and pedestrians at present, this objective should read: Assure that all roads have speed limits consistent with safe use by cyclists, pedestrians and drivers, considering the design and condition of existing shoulders, paths, roadways, and bike lanes.	Speed limits are established by regulations found in the California Vehicle Code, and at this time are beyond the scope of the Local Coastal Plan. Some changes were made by AB43, signed into law in October of 2021, but reductions are limited to 5mph below the current speed limit.
104-24	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-2c: It would more clear to say: On transit routes, provide turnouts for bus operations.	Policy language is r County Transit.

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
104-25	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-2d: THE BICYCLE COALITION SHOULD LOOK AT THE BIKEPED SECTIONS. The national highway entities that are autooriented have specifications for bicycle elements of road projects that are not optimal (or safe) for bicycles. IN BICYCLE & PEDESTRIAN FACILITIES, INCLUDE DEFINITION OF CLASS IV BIKEWAYS. Require development projects to UNBUNDLE THE COST OF PARKING, AND WHEREVER FEASIBLE TO implement measures that increase the average occupancy of vehicles, such as: (GP2020 Revised) INCLUDE DEFINITION OF CLASS IV BIKEWAYS	Comment noted. The Sonoma County Bicycle Coalition has been involved for the last several years in developing these policies. Class IV bike lane policy is included in the Local Coastal Plan.
104-26	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy CT-3j: This could create some problems.	Comment noted
104-27	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Objective C-CT-4e: REDUCE VEHICLE MILES TRAVELED IN ORDER TO Maintain an LOS C or better on roadway segments unless a lower LOS has been adopted.	Comment noted
104-28	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-4e(2): IMPLEMENT MEASURES TO REDUCE VEHICLE MILES TRAVELED ON [Designate and design] Rural Principal and Minor Arterial Roads [as highway routes] that carry large volumes of intercity traffic [and that place priority on the flow of traffic rather than on access to property. The following policies apply to Urban and Rural Arterials]: DELETE	Comment noted
104-29	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-4e (3): DELETE	Comment noted
104-30	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-4e (4): DELETE	Comment noted

#	Comment Date	Name	Organization	LCP Section	Category	Summary	Response
104-31	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-4j: AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, consider intersection management improvements at key intersections throughout the coast as needed to address intersection congestion and long delays for turning movements. These may include installation of traffic signals, signal timing, re- striping, lengthening, turn lane additions, or other improvements, provided the improvements are consistent with the applicable road classifications and protection of coastal resources. (GP2020/Existing LCP)	See "Roadway Safety Improvement" found in Circulation & Transit Element Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-32	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-4k: Construct improvements such as realignment, signalization, roundabouts, turn restrictions, [oneway streets,] and traffic calming at the following intersections to improve safety at the following intersections: (GP2020/Existing LCP revised)	See "Roadway Safety Improvement" found in Circulation & Transit Element Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-33	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-4m: AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, Consider constructing the following sets of road improvements to increase the capacity and safety of State Highway 1 in Jenner:	See "Roadway Safety Improvement" found in Circulation & Transit Element Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-34	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-4n: AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, Consider providing turn lanes at The Sea Ranch intersections listed below. An intersection improvement of lower priority could be constructed before an intersection improvement of higher priority if funding is available.	See "Roadway Safety Improvement" found in Circulation & Transit Element Section 4 "Transportation System Carrying Capacity and Safety Policies".
104-35	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-4q: AFTER REDUCTIONS IN VEHICLE MILES TRAVELED HAVE BEEN REALIZED, consider implementing the following [capacity and] safety improvements along State Route 1:	The Circulation & Transit Element Section 2 "Transit and Trip Reduction Policies" contains policies and programs to reduce Vehicle Miles of Travel.

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104-36	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-4s: While providing for REDUCTIONS IN VEHICLE MILES TRAVELED [capacity] and safety improvements, ensure that State Route 1 shall remain a scenic two-lane highway within rural areas. (New)	The Circulation & Transit Element Section 2 "Transit and Trip Reduction Policies" contains policies and programs to reduce Vehicle Miles of Travel.
104-37	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Goal C-CT-5: Integrate the funding and development of planned circulation and transit system improvements with countywide transportation planning efforts, REDUCTIONS IN VEHICLE MILES TRAVELED, and land use planning and development approval. (GP2020)	Consistent with Senate Bill 743, Level of Service objectives have been removed from the Local Coastal Plan.
104-38	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Objective C-CT-5.3: Maintain acceptable Levels of Service as set forth in this Element by REDUCING VEHICLE MILES TRAVELED (implementing funding strategies for planned improvements).	Consistent with Senate Bill 743, Level of Service objectives have been removed from the Local Coastal Plan.
104-39	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-5a: Review and condition development projects to assure that the REDUCTIONS IN VEHICLE MILES TRAVELED [LOS] and/or public safety objectives established in Policies C-CT-4a and C-CT-4b are being met. If the proposed project would result in INCREASED VEHICLE MILES TRAVELED [an LOS worse than these objectives], consider denial of the project. [unless one or more of the following circumstances exists:	Consistent with Senate Bill 743, Level of Service objectives have been removed from the Local Coastal Plan.
104-40	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-5a (1): DELETE	Comment noted
104-41	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-5a(2): DELETE	Comment noted
104-42	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-5a(3): DELETE	Comment noted
104-43	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Policy C-CT-5b: Require that new development REDUCE VEHICLE MILES TRAVELED, AND [provide project area improvements necessary to] accommodate vehicle and transit movement in the vicinity of the project, including [capacity improvements,] traffic calming, right-of-way acquisition, access to the applicable roadway, safety improvements, and other mitigation measures necessary to accommodate the development without inhibiting public access. (GP2020 Revised)	Consistent with Senate Bill 743, Level of Service objectives have been removed from the Local Coastal Plan.

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104-44	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Program C-CT-1(2): Assesses REDUCTIONS IN VEHICLE MILES TRAVELED [the level of service (LOS)] and how well planned improvements are IMPROVING ACTIVE TRANSPORTATION OPTIONS TO KEEP [keeping] pace with Countywide growth and development	Consistent with Sen objectives have been removed from the Local Coastal Plan.
104-45	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Program C-CT-1(6): Is capable of modeling weekend and of f -peak travel demand in order to MINIMIZE VEHICLE MILES TRAVELED DUE TO [plan for] tourism and special events[traffic].	The Sonoma County Transportation Authority model is capable of weekend and off peak modeling.
104-46	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Change last paragraph: Consider the use of moratoria or other growth management measures in areas where the monitoring program shows that the LOS objectives are not being met due to POTENTIAL INCREASES IN VEHICLE MILES TRAVELED [lack of improvements]. (GP2020)	Consistent with Sen objectives have been removed from the Local Coastal Plan.
104-47	3/23/22	Morgan, Laura	Save the Sonoma Coast	Circulation and Transit	Transportation	Program C-CT-2: Monitor traffic volumes on County maintained road segments, and ADJUST PARKING PERMIT CHARGES TO PREVENT [work with Caltrans on similar State Highway 1 segments that are projected to experience] unacceptable Levels of Service during peak weekend periods, particularly in the summer and fall months. Assemble these data for use in future assessment of THE PARKING PERMIT SYSTEM TO IMPROVE [development project impacts on] weekend traffic patterns. (GP2020)	Parking permits and paid parking are discouraged by the Coastal Commission and seen as inconsistent with the Coastal Act provision for equitable access to the ocean for all people.
105	7/19/21	Scheinok, Tamir	N/A	Land Use	Vacation Rentals	We urge the Sonoma County Planning Commission and Board of Supervisors to reject the proposed Rule and not to delegate the creation of performance standards and / or restrictions to the TSRA Board.	Policy in LCP does not concentration of Vacation Rentals in coastal zone. The vacation rental ordinance being considered independent of the LCP update is limited to abating nuisance and impacts to resources in the coastal zone.
106	10/5/21	Burke, Bryany	Andrew Mann Architecture	Land Use	Housing	I'm working on a residential project for a client at The Sea Ranch. In the past, review of habitat areas at the Sea Ranch has been under the purview of The Sea Ranch Association. As the new LCP and ESHA maps become relevant over lots at The Sea Ranch, we are finding that properties which were created for residences in earlier subdivisions are becoming largely unbuildable for neighborhood appropriate residences under the changing standards at PRMD. What can be done for these affected properties so that the owners are not left with lots that cannot be developed for reasonable residential use?	LCP and Coastal Act protections of environmentally sensitive habitat areas
107-1	9/21/21	Glass, Una	The City of Sebastopol	Land Use	Vacation Rentals	Short term rentals affect the availability of housing, housing affordability, and traffic.	Comment noted.
107-2	9/21/21	Glass, Una	The City of Sebastopol	Land Use	Circulation and Transit	Traffic through Sebastopol has increased significantly due to tourist attractions at the coast. California has adopted laws related to VMT, but this is not really addressed in the plan. The coast is a recreational resource for residents of Sebastopol. Intense use at the coast will overburden narrow winding roads, increasing danger to residents when they go to enjoy coastal recreation, as well as burdening emergency health services. Additionally, emergency services are increasing with more tourism; need to address health services.	Long range planning for health services is beyond the scope of the Local Coastal Plan. For VMT goals, objectives, policies and programs, see: Goal C-CT-1, Objective C-CT-1.3, Policy C-CT-1b, C-CT-1c, C-CT-1e, Program C-CT-P1, C-CT-2b, C-CT-2d, C-CT-3f, Goal C-CT-4, and Program C-OSRC-13-P1
107-3	9/21/21	Glass, Una	The City of Sebastopol	Land Use	Water Resources	Intensification of land uses in the coastal zone, including large scale tourism and wineries, where water resources are known to be scarce, will affect the quantity of water available at the coast. This may impact demand for water sales by the City of Sebastopol to potable water haulers.	Policies in the Local Element prohibit development that cannot be sustainably supported by local water and wastewater provided

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1E	9/14/21	Neale, Bob	Sonoma Land Trust	Public Access	Map Correction	Addresses/apologizes for the decision to not request removal of the K2 point from the draft LCP. Emphasizes role in this process-- as a private land owner.	See Comment 83 response.
2E	3/24/22	Tibbets, Danny	N/A	Public Access	Access Points	Addresses the questions regarding access points. There was no access component at the time of acquisition.	Sonoma Land Trust public access at the
3E	3/25/22	Tibbets, Danny	N/A	Public Access	Access Points	Additional correspondence between SLT and Estero neighbors to correct the published minutes from the march 3rd hearing on public access. Forwards an email from Bob Neale(SLT) regarding the Trailhead. SLT has no plans for developing a public access point or trailhead at the location in Figure C-PA-1k.	Comment incorrectly paraphrases Sonoma Land Trust's position, which is that they have no <u>current</u> plans to develop and access point. Sonoma Land Trust also states that "The narrative in the draft LCP correctly identifies our Estero Americano Preserve as a place where the public can access the coast via SLT's limited guided activities. Section 27.1 and 27.2 of the draft LCP clearly and accurately explains this use."
4E	4/18/22	Biglione, Tom	N/A	Public Access	Paddling	Paddlers should be concerned about continued access to the Estero Americano.	Comment noted. T Access Element supports public access to the Estero Americano.
5E	4/19/22	Dye, John	N/A	Public Access	Paddling	Many landowners have blocked access to the Marsh Road access point. He emphasizes the terms of responsible use of the Estero. Desires a road sign indicating the road as public as well as a public access point. Exhibit A-K	Comment noted. T Access Element supports public access to the Estero Americano.
6E	4/19/22	Kardos, Jennifer	N/A	Public Access	Paddling	Paddlers often assist in the cleanup of the Estero while paddling. Private landowners block the road which inherently gives them more rights than the people of CA.	Comment noted. T Access Element supports public access to the Estero Americano.
7E	4/19/22	Mallory, Dick	N/A	Public Access	Paddling	State laws indicate that there is a right to public access in bridge covered cross waterways.	Comment noted. T Access Element supports public access to the Estero Americano.
8E	4/19/22	Sarfati, Jacqueline	N/A	Public Access	Paddling	Many people respectfully use the Estero for kayaking and would be devastated to have the access taken away.	Comment noted. T Access Element supports public access to the Estero Americano.
9E	4/19/22	Wells, Penny	N/A	Public Access	Paddling	Has been paddling at the Estero for 40 years and has never once witnessed noise issues, or other public disturbances that landowners complain about. Marsh Road should be identified as a public road/access point.	Comment noted. The Local Coastal Plan Public Access Element supports public access to the Estero Americano. The Marsh Road access point is not within the jurisdiction of Sonoma County.
10E	4/21/22	Colton, Thomas	Bay Area Sea Kayakers	Public Access	Paddling	It would be shame for public access to the Marsh Road access point were to be taken away. He lists concerns on how this public access could be confirmed/solidified. He is also open to compromises, but of course those that benefit the kayakers/paddlers.	Comment noted. The Local Coastal Plan Public Access Element supports public access to the Estero Americano. The Marsh Road access point is not within the jurisdiction of Sonoma County.
11E	4/21/22	Moss, Larry	N/A	Public Access	Paddling	The actions of a few (littering, being disrespectful to the land) should not determine whether public access should continue to be allowed. A majority of paddlers/kayakers respect the space and do not tarnish it.	Comment noted. T Access Element supports public access to the Estero Americano.

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12E	4/21/22	Norton, Patrick	N/A	Public Access	Paddling	A majority of trash in the Estero is most likely from the ocean at high tide (crab traps, rope, etc). The water trail is very important to the recreational landscape.	Comment noted. T Access Element supports public access to the Estero Americano.
13E	4/21/22	Norton, Kristine	N/A	Public Access	Paddling	She and her fellow kayakers/paddlers are very respectful of the water and area. More often than not, they are helping to clean up debris that they find. Please maintain public access.	Comment noted. T Access Element supports public access to the Estero Americano.
14E	4/21/22	Steinhart, Beck/Trey	N/A	Public Access	Paddling	Fond memories kayaking at the Estero, and will usually end up picking up trash that is predominantly left by others, not even themselves. Please keep public access available.	Comment noted. T Access Element supports public access to the Estero Americano.
15E	4/21/22	Tescalco, Rudolph	N/A	Public Access	Paddling	Hopes that public access will be continued, as he and many others use the beautiful landscape as a means to get away from densely populated areas.	Comment noted. T Access Element supports public access to the Estero Americano.
16E	4/22/22	Mallory, Dick	N/A	Public Access	Paddling	Shutting out the public from the coast is not at all Californian. Organized Kayak clubs encourage members to inform the casual visitors to not trespass and pick up after themselves.	Comment noted. T Access Element supports public access to the Estero Americano.
17E	4/23/22	Wiscombe, Warren	N/A	Public Access	Paddling	Kayakers are very respectful of the spaces they use. Notes that cow poo washes into the water when it rains, and if ranchers are going to complain about kayak litter, they should be aware of their own. The Estero is a really good for new kayakers to learn as it is a safe environment. Please continue to allow public access.	Comment noted. The Local Coastal Plan Public Access Element supports public access to the Estero Americano.
18E	4/25/22	Mulligan, Jay	N/A	Public Access	Paddling	Maintain access for kayakers.	Comment noted. T Access Element supports public access to the Estero Americano.
19E	4/28/22	Ingram, Lynda	N/A	Public Access	Paddling	Has been enjoying access for at least 22 years. She has only paddled with people who are equally respectful to the space, and desires public access to remain.	Comment noted. T Access Element supports public access to the Estero Americano.
20E	4/29/22	Colton, Thomas	N/A	Public Access	Paddling	A new hiker trail, potential added kayaker stops, and restrooms will be a great addition to the water trail.	Comment noted. T Access Element supports public access to the Estero Americano.
21E	4/29/22	Nagle, Henry	Bay Area Sea Kayakers	Public Access	Paddling	He and all the other kayakers who are respectful of the land would appreciate continued access to the Estero.	Comment noted. T Access Element supports public access to the Estero Americano.
22E	4/29/22	Smith, Hollie	N/A	Public Access	Paddling	Suggests signs that clearly define the borders between private and public land for rec users. Please allow for public access to continue.	Comment noted. T Access Element supports public access to the Estero Americano.
23E	4/30/22	Mallory, Dick	N/A	Public Access	Paddling	Understands that private property should not be trespassed on, so he suggests putting up signs to indicate where the private land is, as well as responsible etiquette.	Comment noted. T Access Element supports public access to the Estero Americano.
24E	5/1/22	Kepner, Alan	N/A	Public Access	Paddling	The Estero allows for many people to see so many beautiful aspects of nature and this should be something that is continued.	Comment noted. T Access Element supports public access to the Estero Americano.
25E	5/1/22	Ogilvie, Chris	N/A	Public Access	Paddling	He has only used the Marsh Road access on the Marin County side. He would like to see other access points, and also acknowledges the need for respecting landowners	Comment noted. T Access Element supports public access to the Estero Americano.

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26E	5/1/22	Prindiville, Mike	N/A	Public Access	Paddling	Has been enjoying the Estero for years and often times participates in cleaning up garbage from the water. Many other kayakers do this too. Please continue to allow public access.	Comment noted. T Access Element supports public access to the Estero Americano.
27E	5/13/22	Bruzzone, Beth	N/A	Public Access	Map Correction	5 points on the map are listed incorrectly. K-1 is on private property without owner's permission. K-2 is not accessible to the public without the Estero or Private property. K-3 is also on private property. K-4 is in Marin therefore has no place on SoCo LCP map. K-5 is on the Bordessa Property. K-1 and K-5 in particular need to be modified due to trespassing.	Locations on the Public Access figures are generalized and to not intended to identify specific access locations.