



SONOMA
COUNTY
REGIONAL
PARKS

BERT WHITAKER
DIRECTOR

MEMORANDUM

DATE: August 30, 2022

TO: Cecily Condon, Project Review Manager
Sonoma County Permit Sonoma

FROM: Steve Ehret, Planning Manager

SUBJECT: Local Coastal Plan – Planning Commission Recommended Draft

Thank you for the opportunity to provide further comments on the current proposed draft LCP. We appreciate the careful listening, cross-checking, editing and thoroughness by Permit Sonoma staff. The draft has come an incredibly long ways since Regional Parks began working on it with Permit Sonoma more than 14 years ago.

Please find the attached proposed minor edits for limited select items.

We welcome the opportunity to meet and discuss the details further with Permit Sonoma staff. If you have any questions, please contact me at Steve.Ehret@sonoma-county.org.

Enclosure

C: Bert Whitaker, Director
Verne Ball, County Counsel

2300

County Center Drive

Suite 120A

Santa Rosa

CA 95403

Tel: 707 565-2041

Fax: 707 579-8247

sonomacountyparks.org

LCP Planning Commission Recommended Draft

Sonoma County Regional Parks' comments

August 30, 2022

Circulation Element

Program C-CT-1-P4: Classify, designate, and design roadways and trails according to meet or exceed the current version of guidelines for road, bicycle and pedestrian facilities, including the Caltrans Highway Design Manual, the State Parks Trails Handbook, publications of the National Association of City Transportation Officials, and the American Association of State Highway Transportation Officials. Use flexibility provisions in these standards to reduce adverse impacts on coastal resources and provide maximum safety and convenience for bicyclists and pedestrians. (PC REVISED - GP2020 REVISED)

Commented [SE1]: Regional Parks uses designs that are more progressive than the State Park Trails Handbook. We blend National Parks, National Forest, BLM, State Parks, National Access Board's ADA standards for outdoor undeveloped trails, combined with our own experience for backcountry trails. Maybe make clear that the standards are for bikeways and sidewalks but not undeveloped trails?

Objective C-CT-2.5: Develop bicycle and pedestrian facilities consistent with the Sonoma County Bicycle and Pedestrian Plan, LCP Public Access Plan, and adopted State and County park master plans to provide alternatives to automobile use. (GP2020 REVISED)

Objective CT-3.5: Provide a diverse range of recreational opportunities through a well-designed network of bikeways, multi-use trails, single-use trails, sidewalks, and related support facilities. (GP2020)

Policy CT-3a: Use the adopted Sonoma County Bicycle and Pedestrian Plan, LCP Public Access Plan, and adopted State and County park master plans as the detailed planning documents for existing and proposed bikeways and pedestrian facilities in the Coastal Zone. (GP2020)

Commented [SE2]: The County Bike & Ped Plan does not include countless recommendations located in these other documents. The doc is a bikeway focused, and leaves out multi-use paths (that have appeared in both the General Plan, existing LCP access plan, and adopted county park master plans and state park general plans.

Policy CT-3b: Use the policies of the Bicycle and Pedestrian Plan, LCP Public Access Plan, and adopted State and County park master plans whenever reviewing development projects to insure that projects are consistent with the Bicycle and Pedestrian Plan and incorporate necessary bicycle and pedestrian improvements identified in the Bicycle and Pedestrian Plan as a condition of project approval. (GP2020)

Policy CT-3d: The Regional Parks Department shall be responsible for establishing and maintaining Class I bikeways, and the Department of Transportation and Public Works (TPW) shall be responsible for establishing and maintaining Class II, III, and IV bikeways and pedestrian facilities along County rights-of-way in unincorporated areas. Where the Coastal Trail or a trail is connecting park properties through right of way, agencies shall coordinate and determine appropriate entity for developing and maintaining the facility. (PC REVISED GP2020)

Commented [SE3]: Regional Parks pulls encroachment permits on TPW/Caltrans ROW for trails – both Class 1 and other trails, and sometimes remains responsible for improvements within ROWs.

Policy CT-3i: Use the following standards for selection of new routes: (GP2020 REVISED)

- (1) If the primary purpose of the route is transportation, then Route-route shall be located along the most direct line of travel that is convenient and safe for bicyclists and pedestrians.
- (2) Routes and bikeway design shall be ADA compliant.
- (3) Avoid/Minimize routes that cross driveways serving commercial and visitor serving uses. Where no alternative route can be identified, consider reconfiguration of on-street parking and other treatments in these areas to improve safety.
- (4) Pavement surface quality - Bikeways shall be free of surface defects that compromise bicycle safety. Utility covers and drains shall align with the bikeway surface and be located outside of the bikeway when feasible. Drainage grates shall be aligned perpendicular to the direction of travel in order to avoid catching bicycle wheels.
- (5) Where bus stops are located along bikeways, design bus turnouts and the bike lane to conflicts between passengers, buses, and bicycles.
- (6) Identification of a reliable source of funds to support maintenance and operation shall be considered before identifying a new Class I Bikeway alignment.
- (7) Bikeway design and route selection shall maximize public benefit and safety per dollar invested.

Commented [SE4]: The purpose of some bikeways, multi-use trails, and other pedestrian routes is often recreational, not transportation.

Commented [SE5]: Often there are other routes, but the overall tradeoffs are worth it. This policy elevates the driveway crossing issue above all other considerations. It needs to be balanced with all other considerations.

Policy CT-3w: Caltrans, State Parks, Sonoma County Regional Parks, Sonoma County Transportation and Public Works shall coordinate efforts to close gaps in the bikeway network and ensure the system is constructed, and maintained. (GP2020 REVISED)

Commented [SE6]: Some Class 1 and multi-use trails are located on State Parks.

Policy CT-3x: Require dedication or purchase of right of way for Class I bikeways-when a nexus can be established between the proposed development and Class I bikeway, Coastal Trail, -or other trail projects identified by the Sonoma County Bicycle and Pedestrian Plan.

LCP Public Access Plan or adopted park master plan. If right of way already exists, require improvements appropriate for the nexus. (GP2020 REVISED)

Policy CT-3gg: Provide high-visibility crosswalk marking at all pedestrian crossings when traffic studies determine it is necessary. ~~Whenever possible~~ When necessary, install pedestrian signalization, refuge islands and signage warning vehicles to stop for pedestrians and watch for bicyclists. (GP2020)

Commented [SE7]: Signalized pedestrian crossings are easily \$1M, potentially conflict with many other LCP policies. There are several existing trail crossings – where a fully signalized crossing is an overkill. If policy points to project specific traffic report, then it doesn't need to address road type – Hwy 1 vs other types of roads

Objective C-CT-4.2: Develop a Heritage Road Program for coastal roadways in consultation with the Coastal Commission, Sonoma County Transportation and Public Works, State Parks, and Caltrans. This program will identify criteria for selecting heritage roads and create special design guidelines to protect the unique character of these roads while maintaining safety, and protecting coastal resources. (CCC REVISED)

Policy C-CT-4m: Implement the following safety improvements along State Route 1:

- (1) Reduce vehicle speeds where Highway 1 passes through developed areas to the maximum extent permitted by State law. (EXISTING LCP REVISED)
- (2) Restrict turning movements at parking areas where necessary to promote safe entry and exit.
- (3) Construct turning lanes and entry improvements at parking areas listed in The Public Access Plan when traffic studies determine it is necessary. (EXISTING LCP REVISED)

Commented [SE8]: There are many existing and planned parking areas that are very small (5-15 cars) where turn lanes could exceed the cost of the development of the parking area, the road is low volume, line of site is great, and traffic report doesn't say it is needed. Obtaining funding for turn lanes is often very hard due to grant restrictions.

Public Facilities

Program C-PF-1-P1: Install charging stations for, electric, or other alternative fuel vehicles at public facilities, and other visitor serving uses, and park facilities where compatible. (CCC REVISED – WAS PROGRAM)

Commented [SE9]: Installing significant utilities at every park staging area/trailhead will result in many LCP conflicts.

Table C-PF-1. Characteristics of Public Water Systems

Information supplied by system operator and California Water Resources Control Board Division of Drinking Water

Stillwater Cove Regional Park	Transient Non-Community	Recreation (campground w/22 sites, Ranger residence, office)	2	0	Canyon well – winter & spring (next to Regional Parks office driveway) Creek well – summer & fall (next to Stockholm Creek)	Adequate for existing use <u>but vulnerable to drought. May be inadequate for and</u> future development <u>of existing campground.</u>
--------------------------------------	-------------------------	--	---	---	--	---

Land Use Element

Table C-LU-4 North Coast Overnight Accommodations

Facility	Hotel/Motel Rooms	Campground Spaces
Gualala Point Regional Park		824

Commented [SE10]: Gualala Point Regional Park has 24 camping sites, not counting the camp host site.

Agricultural Element

I. PROTECTION OF AGRICULTURAL LANDS

Open space acquisitions by the California Coastal Conservancy, the Sonoma Land Trust, the Sonoma County Agricultural Preservation and Open Space District, ~~Sonoma County Regional Parks~~, and the California Department of Parks and Recreation have taken some agricultural lands out of production, but in many cases, land managers have demonstrated that working farms and ranches are compatible with recreational use and retaining the agricultural use on site can be a significant benefit for environmental resource management and cultural interpretation.

Commented [SE11]: Regional Parks is unaware of an acquisition by Regional Parks in the Coastal Zone that has taken ag land out of production. We graze Gualala Pt RP and Wright Hill RP, and our other facilities were not grazed or had commercial ag to our knowledge.

Initiative C-AR-1-I4: Work with California State Parks and Sonoma County Regional Parks, Sonoma County Agricultural Preservation and Open Space District, and other government and non-profit partners to avoid minimize conversion of agricultural land to incompatible uses, and to address impacts to and protection of agricultural lands. (NEW)

Public Access Element

Policy C-PA-2c: Provide a safe, continuous walking and hiking trail consistent with the principles of proximity, connectivity, integrity, respect and feasibility established by

California Coastal Conservancy 2003 plan, “Completing the California Trail”. Wherever feasible, the Coastal Trail should be within sight, sound, or at least the scent of the sea. The traveler should have a persisting awareness of the Pacific Ocean. It is the presence of the ocean that distinguishes the seaside trail from other visitor destinations.

Consistent with these principles, trail segments to the sight, smell and sound of the ocean as possible, or using the following standards: (CCC REVISED)

- (1) Where it is not feasible to locate the trail along the shoreline due to natural landforms or legally authorized development that prevents passage at all times, inland bypass trail segments located as close to the shoreline as possible should be used.
- (2) Shoreline trail segments that may not be passable at all times, or that are not passable by bicycles, should be augmented by inland alternative routes that are passable and safe for pedestrians and bicycles.
- (3) New lateral trails along the bluff edge shall be set back a sufficient distance from the bluff edge to avoid impacts from erosion and sea level rise, generally 50 feet, and native vegetation shall be established and maintained between the trail and the edge to stabilize the blufftop if practical. (CCC REVISED)
- (4) Outlooks and other trail amenities shall be incorporated to discourage damage from informal trails. (CCC REVISED)

Policy C-PA-2e: Avoid locating the California Coastal Trail along or on roads with motorized traffic where feasible. In locations where it is not possible to avoid siting the trail along or on a roadway, the trail should be located off of the pavement, and separated from traffic by a safe distance or by physical barriers that ~~do not obstruct, or detract from~~ minimize obstruction or detraction from the scenic views and visual character of their surroundings. In locations where the trail must cross a roadway, safe under- or over-crossings or other alternative at-grade crossings should be considered in connection with appropriate directional and traffic warning signage. (NEW)

Commented [SE12]: Almost every barrier will have some obstruction and detraction. There will always be posts even if there are just wires.

Policy C-PA-2i: Provide low cost overnight camping and lodging facilities at reasonable intervals along the California Coastal Trail corridor to support long ~~term~~ distance and other hiking and bicycling excursions. (CCC REVISED - NEW)

Policy C-PA-3q: Provide clear directional signs at all public access facilities to indicate the location of trail heads and public parking at the minimum number of signs necessary for easy navigation by the public. ~~If the trail begins on State Highway 1, only one directional sign on~~

~~the highway is necessary.~~ Signs shall be compatible with surrounding views and visual resources, consistent with County Visual Resource Assessment Guidelines. ~~If the trail begins off the highway, there should be a directional sign on State Highway 1 and other directional signs to the trail head.~~ (NEW)

Commented [SE13]: There's often a southbound and a northbound sign before the turn. Without it, u-turns and other traffic impacts may increase as the visitor has no warning of the turn.

Policy C-PA-3r: At trailheads with parking lots provide information, such as information about regulations, contacts in case of an emergency, natural resources, the potential for fires, and the need for user cooperation. (NEW)

Commented [SE14]: There are many trails that do not have informational kiosks located on highway 1.

Policy C-PA-4e: Provide and maintain free or low cost parking for users of public access facilities and public access points, subject to restrictions necessary to protect coastal resources, such limiting number of parking spaces to avoid impacts. (CCC REVISED - NEW GP2020 REVISED)

Commented [SE15]: To make consistent with **Objective C-PA-4.1:** Ensure that adequate parking facilities, including no-or -low cost parking improvements, are provided for each new or expanded public access facility.