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September 30, 2015

RE: Sonoma County Local Coastal Plan Update

Dear County Planning Staff:

Thank you for the opportunity to comment on the draft Sonoma County Local Coastal Plan (LCP).

The Sonoma County LCP is a critical tool for our County to develop and use to protect the diverse and special characteristics found at the Sonoma Coast. By deciding locally to conserve our resources and prevent inappropriate development in the coastal zone, we do ourselves and future generations' great service in preserving the conditions present and enhancing those conditions when possible.

We refer you to letters submitted by CAFF, Richard Charter of Bodega Bay, Jane Nielson of SWIG (and an SCCA Board Member), Sonoma County Chapter of Surfrider Foundation, and Preserve Rural Sonoma County for excellent commentary highlighting a number of points of concern and areas for improvement. We will not relist all of the specific commentary that has been submitted; but echo many of the sentiments put forward in these letters, especially as they pertain to careful and thoughtful use of language to prevent growth and development in our pristine coastal environment.

Residents, neighbors, and generations of Sonoma County activists have worked tirelessly to steward the land that runs the length of the Sonoma Coast. Through the efforts of many we have stopped a nuclear power plant at Bodega Head, enabled coastal access along the length of the entire CA coast through Prop 20 in 1972 and the ensuing Coastal Act of 1976, protected thousands of acres of coastland and lands just to the east of the coastal zone with Sonoma County Agricultural Preservation and Open Space District and other Land Trust dollars, including CA Coastal Conservancy money, and have maintained a rural and scenic quality to the landscape that is world class in quality. It is therefore critical that we are especially careful about language that we allow into the LCP, so that it does not enable inappropriate development or encroach upon the existing majestic scenery and unique sense of place found at the Sonoma Coast.

We have heard from many of our constituents and partnering organizations that the Coastal area is already very congested on busy weekends, holidays and even weekdays during the better weather months (which in current drought times are much more frequent). There are great concerns about the ability of police and fire response times, pedestrian and cyclist safety, as well as rural coastal residents that are negatively impacted by traffic and potential water availability. As stated in the goals of the LCP, we must, "protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources." This guiding goal demands that we must be very careful about what type of development we allow for as



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prescribed, or even discretionary, in our LCP. Too much of a great thing could tip the scales on a major economic generator for our county via tourism, recreation, and coastal jobs.

There are a few areas of particular concern in the LCP that we feel need to be addressed:

- **Internal Consistency:** We recognize the staff's intent, as well as the legal requirement, to have internal consistency in planning documents. As stated above we believe that the coastal zone is a unique place that deserves and demands to be treated differently, thus the LCP "specific plan" type of document. It is not necessary to transfer all the policies from the County General Plan 2020 and insert them into the LCP, as some of the policies that work inland are not appropriate in the coastal zone. We request that definitions and language used to describe the elements of the LCP be made consistent across the elements of the LCP.
- **Agricultural Element:** We support the ongoing existence of agriculture in the coastal zone. However, there is great concern about the LCP anticipation of future increased agricultural tourism and support services language. SCCA does not want to see the problems from the inland valleys transferred to the coast. Issues of overconcentration, groundwater depletion, streams going dry during frost protection efforts, event center proliferation, and increased traffic impacts are all unwanted and unneeded impacts that should be kept to the inland areas to determine how to deal with. We do not want to invite the problems with poor language from the General Plan and lack of regulations of wineries and event centers to the coastal zone.

At the scoping meeting in Timber Cove, it was discussed that potentially agriculture could be delineated to have different categories for small scale or food producing, vs. wine making and production. We feel that it is not fair to categorize the cheese maker who raises cattle on hundreds of acres, adding to the pastoral feel of the coastal zone, in the same way as we would the wine maker who seeks to build an event center with a facility for hosting weddings, corporate events, and retreats.

- **Onshore Support Services for Offshore Development:** SCCA is very concerned with the potential for onshore support services for offshore oil and gas development, or other alternative energy developments off shore should they become economically or technologically appropriate. The LCP should anticipate this type of potential development, and create some guidelines which set a very high standard for permitting, given the potential major impacts that these support services would have for our harbors, fisheries, aquatic ecology, scenic qualities, and potentially on shore development patterns.
- **Water Resources:** Again, see Jane Nielson's letter for specific detailed suggestions. We recommend that new development needs to be required to demonstrate water availability and prove no negative impact on surrounding groundwater or USGS creeks. We must also require assurances that surface water supplies and ephemeral creeks are not impacted by new development. In the coastal zone the streams and rivers are closer to the ocean, and thus have shorter distances to return to the ocean creating fragile ecosystems that require greater caution. Setbacks from streams for development of structures, wells, agricultural lands, etc must be adhered to.



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- **Housing:** There is already great strain on communities for utilities, water supply, road upkeep, and fire and safety services in the Sonoma Coastal Zone. We urge the County to limit expansion of housing to existing communities and not exceed existing infrastructure capabilities. We also must demand that affordable housing be built on-site within any new developments that occur, and again we stress that there should be very limited new development. In-leiu fees are not acceptable in the coastal zone, since the amount of housing and building that will happen in the next 20 years is not enough to aggregate enough fees to build a project in the coastal zone.

We also urge the county to prohibit the use of second dwelling units for vacation rentals and ask that the county begin to regulate the use of existing residences on residential lands for vacation units.

- **Timber Conversions:** We urge you to limit vineyard development to slopes defined in VESCO. We urge an outright ban of all conversions of Class I, II, and III timber classifications, and not allow any conversion of oak woodland or mixed hardwood forests in the coastal zone.

The above are a sampling of items of concern that we sought to convey to county planning staff. Issues of climate change and sea level rise are also of great concern to our organization. We appreciate your attention to our comments and we look forward to continuing to engage the process of updating our Sonoma County Local Coastal Plan. Please keep us on your public outreach list for future meetings or scoping sessions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Rosatti".

Dennis Rosatti
Executive Director