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April 2, 2024

North Central Coast District Office
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Attention: Luke Henningsen, Planner
Stephanie Rexing, District Manager

Regarding: LCP-2-SON-23-0058-2; Sonoma County Local Coastal Plan

Dear Mr. Henningsen,

Please accept this letter and enclosures as Permit Sonoma's response to the LCP-2-SON-23-0058-2; Sonoma County Local Coastal Plan Submittal filing letter dated December 11, 2023. The comprehensive update to the Land Use Plan of the County's three-part Local Coastal Program was submitted for your consideration on November 27th, 2023. This submittal is intended to complete the filing and respond to initial comments, as needed, to facilitate timely certification of the Sonoma County Board of Supervisors Adopted Local Coastal Plan.

The following are intended to respond to the filing letter for LCP-2-SON-23-0058-2 – Comprehensive Land Use Plan (LUP) LCP dated December 11, 2023, and cited four points requiring additional materials or explanation.

1. Word Versions of the LCP Update:

With this transmittal package Permit Sonoma Staff has included a secure link to fully editable Microsoft Word Documents for the Board of Supervisors Adopted Local Coastal Plan Update dated July 17, 2023.

2. Relationship to the Existing Implementation Plan:

The Sonoma County Local Coastal Program is currently certified in three parts: Part 1- the Land Use Plan (Local Coastal Plan), Part 2- Implementation Plan: Coastal Zoning Code, Part 3- Implementation Plan: Administrative Manual. At this time, a comprehensive update to the Local Coastal Plan has been adopted by the Board of Supervisors with direction to staff to update the two-part Implementation Plan (Coastal Zoning Code, and Administrative Manual) following certification. Interim treatment of the current certified Implementation Plan and future formatting changes are further discussed in the enclosed memo titled "Relationship to the Existing Implementation Plan".

3. Incomplete Responses to CCC Comments:

Permit Sonoma has completed a detailed response to the "CCC_LCP Comment Matrix" as found in the enclosed "Permit Sonoma Completed CCC Comments Response Matrix". Formatting of the table has been structured to maximize the ease of use by referencing the varied drafts and responses to each comment and cites any relevant policies or supportive text from the Board of

Supervisors Adopted Draft that was responsive to the comment. Alternatively, Staff has provided explanation of the local context or existing policy direction where no change was made. Staff has also indicated in the response column when further revision, for example, to fix technical errors, would be supported by Permit Sonoma.

4. Suggested Modifications:

Detailed response to the Coastal Commission's in-line comments can be found in the "Permit Sonoma Completed CCC Comments Response Matrix". Permit Sonoma Staff remain eager to work with the Coastal Commission Staff on the Local Coastal Program update. Many of the issues raised in the May 2023 comment letter have been addressed with specific text or policies as referenced in the Comments Matrix. Permit Sonoma's response and the Board of Supervisors adopted language or direction on the major topic issues identified in the "May 2023 Comment Letter" are provided more generally below. This list should be taken with consideration of both the overall implementation strategy and specific responses to inline comments as represented in the "Comments Matrix".

- **LUP land use designations and corresponding allowable uses**

The Land Use Plan (Local Coastal Plan) is the guiding policy level document for Land Use within the Sonoma County Coastal zone boundaries. The Board of Supervisors Adopted Draft further clarified allowed land uses from the Planning Commission's Recommended Draft originally under review by the Coastal Commission. Additionally, the allowed uses for each zoning district are further enumerated in the Coastal Zoning code as such detail is typically not found in a guiding document such as the Local Coastal Plan. The Local Coastal Plan is intended to clarify the intent of each Land Use category and is supported further by the certified Coastal Zoning Code. No uses identified in the Coastal Zoning Code may be inconsistent with the Local Coastal Plan.

- **Ensuring LUP language and definitions properly reflect Coastal Act policy language and definitions**

The Board of Supervisors Adopted Draft included suggested changes for reference to the Coastal Act in policy language, definitions, and in the supporting text as shown in the "Comments Matrix". The goal of the Local Coastal Plan is to implement the California Coastal Act and provide locally appropriate actionable policies. In response to concerns raised by Coastal Commission Staff additional references were made throughout the document to specific language within the Coastal Act. As the Coastal Act is state law outside of the context of an individual Local Coastal Program and may be periodically subject to change by the legislature, Permit Sonoma's inclusions continue to reference the relevant sections and appropriate legislative code.

- **Allowed agricultural land conversion and agricultural worker housing policy concerns**

Clarification was added to further define Agricultural uses and limitations on residential development or conversion of Agricultural Lands. Please see the Comments Matrix for specific citations. Sonoma County local priorities reflect the protection of Agriculture and the allowance for limited agricultural housing opportunities for Existing Agricultural Operations, this is further described in the certified Coastal Zoning Code and is not a proposed change

from the allowed opportunities in the current certified Plan. The Board did adopt Coastal Commission proposed language on limitations on Agricultural parcels to a total of four units.

- **Habitat Protection and Restoration, Wetland Identification and protection, and allowable uses in Habitat buffers**

As further described in the “Comments Matrix” policies were integrated into the Board Adopted Plan to establish minimum buffers and environmental protection for certain species and habitat types. Additionally, methodology including Guidelines for Habitat Protections were incorporated into the Appendices of the Local Coastal Plan for immediate implementation by staff prior to completion of the updated Administrative Manual. Wetland identification and protection will be further addressed in the Implementation Plan update as the County already utilizes buffers implemented through Attachment “M” of the Certified Administrative Manual 2001.

- **Public Access as a Resource Dependent Use**

Additional changes to the Public Access Plan and Public Access Element followed the “May 2023 Comment Letter” provided by the Commission. Additional clarification of water dependent or resource dependent visitor serving uses could be integrated as described in the “Comments Matrix” to resolve this comment.

- **Protection of Water Resources, including siting and design requirements for development pertaining to water supply and wastewater infrastructure**

The Board of Supervisors Adopted Draft furthers protections and development standards for impaired and unimpaired water bodies as defined by the Regional Water Quality Control Board. Water and wastewater infrastructure is further required to provide additional information when implementing upgrades to ensure continued service and to limit impacts to existing resources. Siting and design are further regulated by storm water and grading provisions in the existing County Code. To ensure the most updated provisions are implemented and enforced in the Coastal Zone these standards are applied at the time of project review.

- **Coastal Hazards and Coastal Hazards Response**

The “Permit Sonoma Completed CCC Comments Response Matrix” further addresses the inline comments regarding future hazards and the determination of the best available science. In order to keep the plan current future periodic updates with five year increments are anticipated. Additional guidance was added to the Board of Supervisors Adopted Draft regarding armoring and confirmation of geotechnical requirements. This was a topic of consideration at the July 17, 2023, Board of Supervisors hearing resulting in Adopted Policies which reflect the local context of Sonoma County’s unprecedented bluff retreat. Floodway and Flood Plain considerations are addressed locally through the certified Coastal Zoning Code and may be further updated during the Implementation Plan update phase of the Program.

- **Proposed Transit and Bike Facility Projects**

Opportunities for public transit and related collaboration on the Sonoma County Coast including citing of maintenance facilities are limited by the rural nature of the Coastal Zone and distance from existing service providers. The “Comments Matrix” includes additional discussion on this local context and additional opportunities for implementation. Bikeways and bike facilities project may also be considered in the Coastal Zone with the opportunities further addressed in the Public Access Element.

- **Prioritized Status for Public Facilities and Services**

Additional clarity was provided regarding the prioritization of local uses for service providers and maintenance of reporting to ensure continued service based on current and projected capacities. Existing uses and uses with public benefit, such as those supporting allowable affordable housing in the service area, will be given additional consideration when looking at future connections.

- **Tribal and archaeological resource policies**

The Board of Supervisors Adopted Draft as described in the “Comment Matrix” includes policies for the protection of cultural and historic resources which will be implemented in addition to project specific considerations.

We look forward to our continued collaboration on this Local Coastal Plan update and remain available for any questions or anticipated opportunities to work closely with you through this process and in the scoping of the future Implementation Plan Update. We appreciate the considerate comments and cooperation toward the shared goal of an Updated Local Coastal Plan for Sonoma County. Please reach out directly to Claudette Diaz at Claudette.Diaz@sonoma-county.org with any questions on this submittal or to schedule an opportunity for a working meeting on this document.

Sincerely,

Cecily Condon
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Project Review Manager
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Enclosures:

Relationship to the Existing Implementation Plan

Permit Sonoma Completed CCC Comments Response Matrix

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