

Permit Sonoma Completed CCC Comments Response Matrix

Page	Policy Number	Original Comment	New Comment on PC Recommended LCP	Board of Supervisors Adopted Draft, Permit Sonoma Response
LU-14	Table C-LU-1	Consider folding this diagram into a policy regarding priority and non-priority uses. For reference a sample policy from the HMB LCP includes: <b>2-3. Priority Land Uses.</b> 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 commercial recreation facilities. b. Local Priority Uses: Affordable dwelling units for extremely low, very low, and low-income households. Local Priority Uses are considered second tier priority behind Coastal Act Priority Uses in this LCP	Water dependent coastal recreation <u>is</u> coastal dependent recreation. It's unclear here what the difference is between water dependent recreation and coastal recreation. Please provide a definition of coastal dependent recreation vs. water dependent recreation Visitor serving recreation should not be a lower priority than local priority uses. Staff is still unsure what is the practical effect of ranking these priorities, as there seems to be no specific policies associated with table. What is the ultimate purpose of this table?	The BOS adopted LCP glossary defines Coastal Dependent Development or Use as "Any development or use which requires a site on, or adjacent to, the sea to be able to function at all". If additional clarification is needed the visitor-serving commercial recreation item could be changed to "non-coastal or non-water dependent visitor-serving commercial..." to clarify that those coastal or water dependent visitor-serving uses remain a higher priority over other visitor-serving uses. Table C-LU-1 is an update of a table in the current LCP and is familiar to the public and staff.
LU-16	N/A	New comment	As part of the general land use policies consider including a policy that supports Coastal Act Policy 30250	The land use designations as shown in <b>Figures C-LU-1a</b> through <b>C-LU-1k</b> in the BOS adopted LCP Land Use Element limits residential and commercial uses to existing developed areas, consistent with Coastal Act Section 30250(a). Industrial uses are limited to the commercial harbor area of Bodega Bay, and must provide <b>services that support commercial fishing or other coastal-dependent industries.</b>
LU-18	Table C-LU-3: Open Space Land Use Designation	The inclusion of Planned Community Zoning in Open Space Land Use Designation may be a concern here in terms of impacts to coastal resources. Please provide reasoning as to why this would not impact open space.	Please provide an explanation as to why the planned community zoning district is associated with both recreation and open space. Open space particularly seems incompatible with a planned community. Please include one more column in this figure that says what Principally Permitted Use is for each row.	Planned Community Zoning is a combining district associated with residential development projects with a Precise Development Plan (See BOS adopted LCP Land Use sections 2.2 and 2.3) This Zoning is applied to Dedicated Open Space land use at The Sea Ranch and to Recreational Land Use in developed recreational amenities such as the golf course at Bodega Harbour.
LU-18	Table C-LU-3: Commercial Tourist Zoning District	Recreation is missing in the commercial tourist zoning district, please provide an explanation as to why it was removed or include it here.	See original comment	The Recreation Land Use is reserved for RRD Zoning, which allows for resource related and passive recreation, and for the PC Zoning district, which is limited to Planned Development communities shared spaces. Commercial Tourist recreational uses are high intensity that may be inconsistent with resource protection policies of RRD zoned parcels, and incompatible comparable with low intensity common area uses allowed by Planned Community Zoning or associated Precise Development Plan.
LU-18	Table C-LU-3: Commercial Services	Marine Industrial is missing here, please provide an explanation as to why it was removed or include it here	Please make sure that all of these zoning districts match the new maps that are produced. There are still several zoning districts that are in the maps that are missing here	Marine Industrial was a draft land use designation that was incorporated into the Commercial Fishing land use. The Glossary, Land Use Maps and <b>Policy C-OSRC-9a</b> will be corrected to refer to Commercial Fishing, not Marine Industrial. The <b>Glossary will be updated to include a definition of Commercial Fishing.</b>
LU-18	Table C-LU-3: Public Facilities	Please include "Visitor Serving" facilities here as well	See original comment	Lands designated Public Facilities are owned and operated by a city, county, special district, federal agency, or state for the primary purpose of providing an essential public service, including public safety, administrative services and the production, generation, transmission, collection, and storage of water, waste, or energy. While public parks and similar non-commercial visitor-serving uses are allowed in Public Facilities land use. Commercial Visitor serving uses are inconsistent with the purpose of this land use and not included.

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LU-18	Table C-LU-3: Urban Residential	Please explain the purpose behind including Planned Community in Urban Residential instead of being in its own land use designation as it has been previously.	See original comment	See response above for the first response on <b>Table C-LU-3</b> regarding Planned Community.
LU-19	Land Extensive Agriculture: Other Residential Uses	Please include this below as its own policy.	See original comment	Format for this land use is identical to all other land use tables, which have a separate row identifying "Other Residential Uses". Residential Uses and standards will be further defined by the Implementation Plan (Chapter 26C Coastal Zoning Code).
LU-20	Diverse Agriculture	Please provide an explanation as to why agricultural employee units and farm family dwellings do not count towards density.	See original comment	Agricultural employee units are necessary to support larger agricultural uses, and this policy incentivizes farmers to provide on-site worker housing. The Coastal Zoning Code, Implementation Plan, further defines the thresholds for qualifying agricultural uses needed to support the housing request. Each Agricultural Resource table also identifies that in no case shall residential units exceed four
LU-31	C-LU-4f	If this ordinance will be administered through the LCP, it should exist in the body of the LCP, such as in an appendix.	See original comment	The Sonoma County Mobile Home Rent Stabilization Ordinance is not administered through the Local Coastal Program, but is referenced in the LCP for consistency with the Sonoma County General Plan Housing Element.
LU-32	C-LU-4g	New Comment	Please remove the section that states "not part of any use on the same parcel that is subject to transient occupancy tax." While ADU's can be protected from STR use, a STR and an ADU should not be mutually exclusive	The certified Sonoma County Coastal Zoning Ordinance Section 26C-325.1. prohibits transient occupancy of Accessory Dwelling Units. Junior Accessory Dwelling Units are not allowed at this time by the Coastal Zoning code. This policy was amended as follows to clarify that the ADU or JADU cannot be subject to any use requiring TOT but it does not impact other detached structures on the parcel. <b>"Policy C-LU-4g: Accessory Dwelling Units, Junior Accessory Dwelling Units, and structures containing a Junior Accessory Dwelling Unit, or structures with an attached Accessory Dwelling Unit shall not be used as a vacation rental or any other use that is subject to transient occupancy tax."</b>
LU-32	C-LU-4h	Please include these details in the "Urban Residential" category overview above.	See original comment In addition, there needs to be a note that there will be a housing density ordinance passed in the future to effectuate this policy, such as through a program	A housing density ordinance will be included in the implementation phase of the Local Coastal Program to update the existing Sec. 26C-326. - Affordable housing; requirements for long-term affordability and design and construction section of code. As the code section already exists a specific program was not identified.
LU-33	C-LU-4l	Please explain how it is possible to have multiple single family dwelling units in a lot if you can't split it? It may be helpful to walk us through an example here.	Please include what the subdivision criteria are here, this policy is confusing without more context	In some cases, protection of coastal resources would limit development to a small portion of the lot, and the resulting subdivision could not meet standards for minimum lot size, setbacks, access, etc. This policy allows compact clustered development in order to maximize protection of coastal resources.
LU-33	C-LU-4u	This should be in the Public Works chapter. Make sure allocations are outlined, making sure Coastal Act priority uses are prioritized.	See original comment	Policy reference is from a previous version of the LCP. This policy ( <b>C-LU-4t</b> ) will be enforced concurrently with the public services policies associated with water and wastewater systems, but it is primarily a housing policy to retain opportunities for extremely low, very low, low-income households, and accessory dwelling units.

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LU-33	C-LU-4o	This policy should match state housing law on prohibiting displacement consistent with Policy 6042. "Replacement Housing Prior to Displacement; Notices to Displaced Persons"	See original comment	References to California Coastal Act Policy Section 30604 (f)-(g) in introduction of 4. Affordable Housing section references the importance of encouraging the protection of existing affordable housing. The policy on Condominium Conversion ( <b>C-LU-4q</b> ) is to mirror and give new reference point to the Housing Element Policy currently referenced in the County Coastal Zoning Code. The new LCP will effectively replace the General Plan Housing Element within the Coastal Zone, making it essential to maintain a policy for Condominium Conversion Use Permit Standards as part of the LCP.
LU-33	C-LU-4q	Please explain the reasoning behind including these policies. Generally, the level of detail provided here is not common to have in a LCP, and may not be supported by the Coastal Act Please reference the law being cited here, as well as please make clear where you're drawing these housing rankings from.	See original comment	See response to <b>Policy C-LU-4q</b> above.
LU-34	C-LU-4s	Please include this policy: <b>Policy C-LU-5dd:</b> Encourage development of employer provided or subsidized affordable housing for employees. ( <b>Existing LCP</b> )	See original comment	The BOS Adopted LCP Land Use Element has changed this to <b>Initiative C-LU-4-I1</b> and retained the language of <b>Policy C-LU-5dd</b> .
LU-37	C-LU-5b	Where is this limited to? Link this to relevant Sonoma zoning.	Please simplify this and make it more specific, and please ensure that urban service areas and rural community boundary are defined, so that it is clear where exactly visitor-serving commercial development would be limited.	BOS adopted LCP <b>Policy C-LU-5b</b> states: "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 farm stays)." Urban Service Areas are shown on the Land Use Maps, and <b>Policy C-LU-6j</b> identifies Rural Communities in the Coastal Zone.
LU-38	C-LU-5h	Please define what modest scale expansion might mean in this instance.	Please define what limited scale expansion might mean in this instance.	The BOS adopted LCP Land Use Element <b>Policies C-LU-5g</b> through <b>C-LU-5u</b> provide guidance for implementation of area specific policies, which will establish specific development standards.
LU-38	C-LU-5k	Please define what modest scale expansion might mean in this instance	Please define what limited scale expansion might mean in this instance.	The BOS adopted LCP Land Use Element <b>Policies C-LU-5g</b> through <b>C-LU-5u</b> provide guidance for implementation of area specific policies, which will establish specific development standards.
LU-41	C-LU-6b	Please be more specific here about what may or may not require a LCP amendment.	Please state here that a density bonus program needs to be certified.	BOS adopted LCP Land Use Element <b>Policy C-LU-6b</b> refers to the Coastal Zoning Ordinance, which will be updated as part of implementation. As part of the Sonoma County Local Coastal Program, certification of any Local Coastal Program amendment is a mandatory legal requirement.
LU-41	C-LU-6m	Consider moving this to the Public Facilities and Services chapter.	Please include the Bane bill in the appendix of this chapter	The Bane Bill (AB 2706) added Section 30610.6 to the Public Resources Code, which can be found in the Land Use Element "Relationship to the California Coastal Act" section. Provisions of Section 30610.6 relate specifically to residential development rather than development of public facilities and services.
AR-5	<i>Farmland in the Coastal Zone</i>		This definition needs to match the definition in Coastal Act Regulations.	The complete text of Coastal Act sections including the relevant definitions 30241, 30241.5, and 30242 are included in the BOS adopted LCP Agricultural Resources Element.
AR-6	<i>Farmland in the Coastal Zone "In the coastal zone, there is none of this highest rated land"</i>		Agricultural land here should be defined as prime and non-prime agricultural land.	Because of climate, soil, and geology, no lands in the Sonoma Coastal Zone meet Coastal Act or Department of Conservation definitions of prime farmland or farmland of statewide importance. Additionally, parcels used as farmland are large and with only a portion of the farm or ranch within the Coastal Zone. The Agricultural Resources Element uses "Grazing Land" and "Farmland of Local Importance" to maintain consistency with terminology in the Sonoma County General Plan and Department of Conservation definitions.

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AR-7	Objective C-AR-1.1		...Unless allowed on a case by case basis" Reference the policy that states when conversion is allowed here.	The BOS adopted LCP Agricultural Element <b>Objective C-AR-1.1</b> does not provide exceptions to avoiding conversion of agricultural lands, and is intended to be more protective of agricultural land than the Coastal Act requires. The comment appears to refer to an older version of the Local Coastal Plan during review by the Sonoma County Planning Commission.
AR-7	Objective C-AR-1.6	Please be more specific on how commercial is being defined here, as agriculture is not necessarily tied to commercial production.	See original comment. Why does this need to be explicitly commercial? What about small, non-commercial operations?	<b>Objective C-AR-3.1</b> was written to be consistent with the definition of an agricultural enterprise as defined in the County's existing Right-to-Farm ordinance.  The Coastal Zoning Code, certified Implementation Plan, defines Agricultural Enterprise as an operation of a property owner/operator that derives their primary and principal income from the production of agricultural commodities for commercial purposes, including but not limited to the following: growing of crops or horticultural commodities; breeding and raising of livestock, poultry, bees, furbearing animals, horses; agricultural processing; and preparation of commodities for market. An agricultural enterprise excludes boarding of horses, forestry and lumbering operations, and commercial transportation of prepared products to market.
AR-7	C-AR-1a		Please explain why this section was removed here: "C. land divisions outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels."	<b>Objective C-AR-1.6</b> specifically applies to the Land Extensive Agriculture and Diverse Agriculture land use categories, and specifies that parcels be "capable of the commercial production of food, fiber, and plant material; or the raising and maintaining of farm animals." Staff would be in support of a recommendation changing this to "Agricultural Operation" consistent with Right to Farm Ordinance and input from the Sonoma County Farm Bureau.
AR-8	C-AR-1d	Is it the intent of the county to avoid agricultural land conversion completely? If not, please include a policy that states when conversion would be ok, including how it would occur and what mitigation would be associated with the conversion. HMB 2020 certified LCP policy on mitigation for conversion of agricultural lands:	Conversion should be prohibited in most cases, not just for allowing increased residential density. Please expand this to track Coastal Act Policy 30242 which prohibits conversion except under specific circumstances.	Policy <b>C-AR-1d</b> prohibits increasing residential density in all agricultural land uses without exception. This policy supports local goals for preservation of agriculture and is more restrictive than Coastal Act Section 30242. Section 30242 is included in the BOS adopted LCP Agricultural Resources Element introduction.
AR-8	Table C-AR-2	There needs to be restrictions on the size and type of agricultural worker housing and how it applies to density. Language from the Marin County Certified LUP, C-AG-5b states:	There needs to be more information on these terms, including how do they differ, where are they allowed, and what density is allowed?	<b>Policy C-AR-2</b> identifies agricultural uses and support uses allowed and permit thresholds and do not include policies for farm working housing. Goals, Objectives, and Policies for farmworker housing are found in Section 3 of the BOS adopted LCP Agricultural Resources Element. These policies ( <b>C-AR-3a</b> through <b>C-AR-3c</b> ) provide guidance for implementation of area specific policies, which will establish specific development standards for farmworker housing. Development standards are further defined in the certified Local Coastal Programs Implementation Plan (Coastal Zoning Code)

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AR-9	C-AR-1j	Does the County intend to have any specific policies regarding the Williamson Act? The Marin County LCP has a policy regarding the Williamson Act and agricultural worker housing shown here, below:	Please instead of citing the outside document "Uniform Rules for Agricultural Preserves and Farmland Security Zones", list the compatible uses here.	The Sonoma County Board of Supervisors did not adopt any policies specific to the Williamson Act for the Local Coastal Program as this program deals with legal contracts and not land use related permitting. The "Sonoma County Uniform Rules for Agricultural Preserves and Farmland Security Zones" govern Williamson Act (Land Conservation Contracts) implementation countywide and are generally more restrictive than the base zoning district on allowed uses.
AR-9	C-AR-1k	Please provide an explanation here as to why minimum parcel size for prime lands would be smaller than for non-prime lands. It seems like it would be preferred to not allow prime land subdivided to smaller sections than non- prime lands. Are there prime lands in the Sonoma Coastal Zone? There should be a discussion of Prime and Non-prime agricultural lands and how they apply to Sonoma in this document. Prime lands should be indicated on maps if they are used here.	Please instead of citing the outside document "Uniform Rules for Agricultural Preserves and Farmland Security Zones", list the compatible uses here.	Compliance with the Sonoma County Uniform Rules for Agricultural Preserves and Farmland Security Zone is a legal requirement of all Williamson Act contracts, regardless of provisions found in the Local Coastal Program. Development associated with the agricultural or open space uses related to a contract are still subject to the Local Coastal Program as would normally be applied to the project.
AR-11	Agricultural Support Uses	This term needs to be defined in the glossary. While the glossary defines Agricultural Support Services, it does not define Agricultural Support Uses, or Agricultural uses. If "agricultural support uses" is the same as one of the defined terms, please use that term instead of this variation on the term. Generally, when a policy depends on specific words or phrases and definitions, they need to be included in the glossary, used in the form defined in that glossary, and reviewed for Coastal Act consistency.	Please define the term "agricultural visitor serving uses" and apply consistently	Agricultural Visitor-Serving Uses (Agricultural Tourism) is defined on <b>Page AR-11</b> of the BOS adopted LCP Agricultural Resources Element as "any visitor-serving uses on agricultural land that supports and enhances agricultural activity. Examples of these uses are farm stays, farmstands, and retail sales of products grown onsite."
AR-14	C-AR-2c(6)		...and rural character	This policy protects residential development, and applied to both rural and urban. The Coastal Act does not specifically mention rural character, but Sections 30253(e) requires development to "protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses." This section is identified in the BOS adopted LCP Land Use, Circulation and Transit, and Public Facilities Elements.
AR-14	C-AR-3a	There needs to be a policy that provides more detail on what is allowable in farmworker housing/agricultural dwelling units.	-Please define Agricultural worker housing -Do other development standards apply besides density?	BOS adopted Local Coastal Plan policy <b>C-AR-3a</b> provides appropriate detail for the planning document. Specific standards are certified in the current certified Coastal Zoning Code and will be considered during update of the Coastal Zoning Ordinance (Implementation Plan).
OSRC-18	C-OSRC-4c	The Habitat Development Guidelines described in stated as policies within the body of this document and not in the appendix. Appendix E-3 should be	Please include the key elements of the Habitat Development guidelines into this policy,	The Elements in the Sonoma County Local Coastal Plan generally do not reintegrate specific standards and policies found in the appendices. This stylistic choice reduces possible misinterpretation of the appendices by directing the reader to the appropriate appendix rather than paraphrasing information contained in the referenced document. These guidelines will ultimately be moved into the Administrative Manual for ease of use and access by the public and staff with certification of the Implementation and Plan and future technical updates for references to the location.
OSRC-19	C-OSRC-4g	Please include specific guidelines regarding what biological productivity and quality are going to be restored to, e.g., how the LCP will set baselines.	See original comment. In addition please fix the labeling as there are two policies labeled as 4g.	Details added to address CCC Concerns. Policy regarding the preservation of Chinook and Coho Salmon Habitat was moved to the Open Space and Resource Conservation Element under Policy <b>C-OSRC-4h</b> , because the OSRC element includes polices on resource conservation.  <b>Policy C-OSRC-4i:</b> Maintain and restore the biological productivity and the quality of coastal waters, streams, wetlands, ponds, and estuaries in order to maintain optimum populations of marine organisms and to protect human health.

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OSRC-21	C-OSRC-5a	This seems unnecessarily vague, should mention here that the Coastal Commission's definition of wetlands is a single- parameter definition that requires evidence of only one of three wetland indicators (hydrophytic vegetation, hydric soils, or saturated substrate), while the US army corps of engineers requires all three. In addition, you could mention that since the LCP adheres to the coastal act, it follows the single-parameter definition.	Please make it clear here that only one of these parameters are needed to define a wetland.	The LCP adheres to the Coastal Act and follows the single-parameter definition of wetlands, which is described in Section 5 of the OSRC Element and <b>Appendix E: Natural Resources</b> .
OSRC-22	C-OSRC-5d	Please include policies listing the permitted uses in buffer zones for each habitat, including ESHA.	This policy as written allows for development within buffers if a study allows it. No development except for resource dependent uses should be allowed for buffers, and buffers should only be reduced under specific circumstances.	Policy <b>C-OSRC-5d</b> is specific to wetlands, not all categories of ESHA. Additional guidance for all buffers, including wetlands will be developed during implementation as part of an updated Coastal Administrative Manual. Policy <b>C-OSRC-5d</b> prohibits reduction of wetland buffers except where the proposed development will have <b>no</b> potential for an adverse impact on the wetland. This policy is not intended to allow development within a buffer, only reduction of the buffer boundary provided that the reduced boundary will not reduce protection of the resource. Permit Sonoma staff would support changes in this policy to clarify that it applies to reducing buffer area, not to development within the buffer.
OSRC-22	C-OSRC-5d		Please include the key features of Appendix E-3 in the body of this element.	The OSRC Element references <b>Appendix E: Natural Resources</b> throughout the element.
OSRC-22	C-OSRC-5e	Habitat Protection Guidelines referenced here should be included as specific policies within this chapter, not in the appendix.	Please include the key features of Appendix E-5 in the body of this element	Riparian Corridor policies can be found in Section 4 of the OSRC Element. The Guidelines referenced here are multiple pages and not appropriate level to include as policy language. These guidelines will ultimately be moved into the Administrative Manual for ease of use and access by the public and staff with certification of the Implementation and Plan and future technical updates for references to the location.  <b>Policy C-OSRC-4c:</b> Allowable uses and development within any streamside conservation area or Riparian Corridor shall be evaluated consistent with the Habitat Development Guidelines criteria. Construction, operation, and maintenance, or development shall not result in any significant, long-term adverse impacts on the functions and values of the riparian habitat.
OSRC-22	C-OSRC-5e		The sentence "The more specific permissible use provisions of this policy shall control over the more general use provisions for other types of ESHA identified in Subsection 8. "Environmentally Sensitive Habitat Areas". Should be a stand alone policy, as the more protective/specific polices should always apply.	Style and organization comment that does not appear related to consistency with the Coastal Act.
OSRC-23	C-OSRC-5i	Mitigation and restoration policies should be included in the body of this chapter, not in Appendix E-5.3	Please provide an explanation on how mitigation banks would be used in this case. Are there existing banks with comparable habitat in Sonoma. Please edit "If no appropriate restoration site is available" to there is no feasible on-site restoration available"	Mitigation ratios are included in Policies <b>C-OSRC 5i, C-OSRC-7o; C-OSRC-8h, C-OSRC-7o. Appendix E Section 1</b> describes restoration and monitoring requirements.



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OSRC-29	C-OSRC-7b	Please reference what buffers/policies are being referenced here	See original comment	Policy <b>C-OSRC-7b</b> requires buffers around all sensitive biological resources. These buffers will be established during implementation and periodically updated to evolve with new data and science.
OSRC-32	C-OSRC-7r-7u		Please insure that these policies establishes buffers for sensitive bird species as such: no less 300 feet for passerine,500 for raptor, and 600 for heron	Change Implemented see <b>Policy C-OSRC-8e</b> : Establish buffers around ESHA to protect it from development impacts. ESHA buffers shall be developed in accordance with <b>Appendix E-3</b> . All buffers around ESHA shall be a minimum of 100 feet in width; a lesser width may be approved by the County as addressed in Subsection 8. "Environmentally Sensitive Habitat Areas" and <b>Appendix E-3</b> . Generally, a 600-foot buffer is required for heron rookeries; a 500-foot buffer for occupied raptor nests; a 300-foot buffer for any occupied burrow of a burrowing owl. However, these buffers may be reduced, to a minimum of 100ft, in consultation with resource agencies and with the recommended mitigation and monitoring for impacts. Only developments consistent with Subsection 8. "Environmentally Sensitive Habitat Areas" shall be allowed in ESHA buffers. Buffers shall take into account reasonably foreseeable effects of sea level rise and climate change.
OSRC-35	C-OSRC-8e	Policy C-OSRC-b(10) is not in this chapter. Please describe what policy you are citing here.	Please be specific here instead of referencing: "Subsection 8. Environmentally Sensitive Habitat Areas"	The current language referenced the section to ensure that all applicable policies of the <b>Section 8</b> . are considered. Different subsets of policies may be needed depending on the circumstance so the language is intended as inclusive of all applicable requirements.
OSRC-35	C-OSRC-8e	Please include policies listing the permitted uses in buffer zones for each habitat, including ESHA.	Please be specific here instead of referencing this section generally. Please include a specific policy on allowable uses in ESHA.	Permitted uses in buffer zones for each habitat, including ESHA, will be defined in the Implementation portion of the LCP update. Implementation will include updates to the Zoning Code and Administrative Manual. At this time uses requiring a CDP are not permitted in buffer zones but there are provisions to allow for reduced
OSRC-35	C-OSRC-8e	There needs to be an explicit description of allowable uses and development standards for each habitat area including but not limited to wetlands, riparian areas, general ESHA	Please be specific on allowable uses within ESHA, describe allowable uses in, wetlands, and describe allowable uses for Riparian within the body of this element, not in Appendix E-5.1	Policy was revised to restrict any significant, long-term, adverse impacts on the functions of riparian habitat. OSRC Element describes allowable uses within coastal waterways, riparian vegetation, and biotic habitat. Specific permitted uses will be described in the Zoning Code update during Implementation.  <b>Policy C-OSRC-4c</b> : Allowable uses and development within any streamside conservation area or Riparian Corridor shall be evaluated consistent with the Habitat Development Guidelines criteria. Construction, operation, and maintenance, or development shall not result in any significant, long-term adverse impacts on the functions and values of the riparian habitat.
OSRC-36	C-OSRC-8h,8d, 8e	The county needs to define what uses are allowed in ESHA as a separate policy within the body of this chapter.	Please define what uses are allowable within ESHA. Needs to be more specific as this is referenced several times including C-OSRC- 8h,8d, and 8e. Please also clearly define what uses are allowed within ESHA buffers.	Definition of ESHA has been added to the Glossary which includes specific criteria on how to identify ESHA. Permitted uses will be described in the Zoning Code update during Implementation.
OSRC-36	C-OSRC-8i	Native landscaping may be allowed, but not required	Please add additional text "For new development where landscaping is proposed adjacent to ESHA."	Policy moved to <b>C-OSRC-8i</b> .  Policy <b>C-OSRC-8i</b> : Adjacent to ESHA, the use of compatible native, non-invasive plant species for landscaping shall be required as a condition of coastal development permit approval. The use of invasive exotic plant species shall be prohibited. No landscaping shall extend into ESHA.
OSRC-36	C-OSRC-8h		Mitigation ratios for ESHA should be provided at a minimum of 3:1	Mitigation ratios were set generally at 2:1 though 3:1 is required for protected Riparian areas. Additional Mitigation ratios will be addressed in Implementation.

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OSRC-36	C-OSRC-8h		Regarding the sentence "where off- site habitat mitigation is more protective". When would off-site mitigation be <u>more</u> protective?	Determining specific circumstances regarding on or off site mitigation is project specific. Standards for evaluation will be part of the Coastal Administrative Manual and developed as part of implementing the LCP.
OSRC-36	C-OSRC-8h/8J	New Policy	"...in accordance with applicable Local Coastal Plan Policies" Please state here what policies are being referenced.	Mitigation ratios are included in <b>Policies C-OSRC 5i, C-OSRC-7o; C-OSRC-8h, C-OSRC-7o. Appendix E</b> Section 1 describes restoration and monitoring requirements.
OSRC-Appendix E	Appendix	The Habitat Development Guidelines described in Appendix E-3 should be stated as policies within the body of this document and not in the appendix.	See original comment.	<b>Appendix E</b> is referenced throughout the OSRC Element and was adopted as a part of the Local Coastal Plan update. While reviewing any proposed projects, the Planner must refer to all adopted policies and any requirements and guidelines found in the Appendices. Eventually these guidelines will become part of the Implementation Plan as the Administrative Manual.
PA-3	N/A	Please also include here a discussion of the balance between Section 30240 of the Coastal Act and Public Access and Recreation. It should be made clear that only "resource-dependent uses" are allowed in ESHA.	Please include public access and resource-dependent uses. "While public access is a high priority use, Coastal Act Section 30240 requires that development is subordinate to protection of environmentally sensitive habitat areas, and that recreation areas and <b>resource dependent uses</b> shall be compatible with..."	Page PA-3 and PA-8 of the BOS adopted LCP Public Access Element quotes the entire text of Section 30240 verbatim.
PA-14	N/A	Please consider including in this chapter a rough timeline of the planned trail segments, if the county has some idea of the timelines needed for establishing these trail segments.	Please include a Loose timeline associated with "proposed" public access. In addition the word proposed implies that this access point is already decided, and this is not the case, the access point would still need to go through a permit review process. Staff would prefer the words "preferred" or "identified"	The timeline of planned trail segments depends on a variety of factors, including CDP processing and Regional Parks.
PA-14	Public Access Plan		Please explain here the process and history of how the PAP was created	The Public Access Plan was revised to include more information on "Existing" vs "Proposed" trails. <b>Figures C-PA-1a-k</b> shows the location of the existing and the general location of proposed access points in order to allow for flexibility in planning and developing proposed access points.
PA-14	Public Access Plan "Proposed"		Please explain what "proposed" means in terms of actual impact on public access. What is the timeline for "proposed" public access points?	"Proposed", in the context of public access, is defined on page PA-14 of BOS adopted LCP Public Access Element as "the nearest public point to the approximate location of the trail alignment described in the Public Access Plan, or that an alignment between two end points has not been identified or that several alternative alignments need to be evaluated." Development of proposed accessways is dependent on a number of variables, such as ownership, Coastal Access Plan priority, financing, and coastal resource protection, and forecasting a timeline is not possible.
PA-16	N/A	Please define what acquisition means here. Through formalized access points? Dedication of easements? Trail building?	See original comment	See <b>Section 3 Public Access Acquisition</b> : "Acquiring public access can be accomplished in several ways including, but not limited to, purchase or donation of property, dedication of an easement for public access, or establishing that continuous historic public use has established an access easement across private property." Trail building is development, not acquisition.



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PA-17	N/A	As the Public Access Plan seems to be central to this chapter, please include more details on how this plan was formed, and how the acquisition and development priorities were selected. In addition, please include any and all overarching themes, goals, and directives that come out of the Public Access Plan in this chapter. It is such a large document and due to its importance, should be incorporated as much as possible in this chapter.	While Policy PA-1b gives more detail on how the acquisition priorities were established, and the same for the seem like they should be in the description beforehand, not policy language as these priorities have already been set. following Policy 1c these descriptions	The <b>Public Access Plan</b> reflects local priorities and was updated from the existing 2001 Plan and priorities were shifted due to feasibility or progress made since the original date however most of the items were already established. Permit Sonoma staff was not directed to revise these policies to incorporate additional background on acquisition priorities.
PA-17	C-PA-1a		Please describe further in this element what the public access plan is, how the priorities are set and what are the development and acquisition priorities?	Background on the <b>Public Access Plan</b> can be found on <b>Page PA-14</b> .
PA-17	C-PA-1b	These acquisition priorities are confusing when not in context of Appendix B. Please include a section explaining these priorities, how they relate to Appendix B, and how the different priorities were selected.	See original comment	The Public Access Element provides goals, objectives, and policies, while the Public Access Plan is the way those goals, objectives, and policies will be implemented. Pages <b>PA-17 and PA-18</b> were revised for the BOS adopted draft to provide additional clarity on priorities.
PA-19	C-PA-1e/1f		Can these policies be combined and streamlined? Consider combining.	BOS adopted LCP Public Access Element policy <b>C-PA-1g</b> relates to developing public access. <b>Policy C-PA-1i</b> relates to maintaining and managing public access.
PA-19	C-PA-1g	For this plan to be a guidance, it needs to stand on its own. Please provide more specifics from the Public Access Plan (PAP) here, and central points around the guidance coming from the PAP.	How does the public access plan affect this? Please include more elements from the PAP in this chapter.	Policy revised to include details on park needs.  <b>Policy C-PA-1g:</b> Use the Public Access Plan project list found in <b>Appendix B</b> as the guide for determination of undeveloped (passive) park needs in the Coastal Zone, including County Regional Open Space Parks, Regional Trails, and State Parks in order to support coastal recreation.
PA-20	C-PA-1i	New policy	Please make this policy more specific to help describe what this policy will be trying to accomplish. What will the offers of dedication specifically be for?	Offers of Dedication will increase opportunities for public access to the coast.
PA-22	C-PA-2h	Please define what adequate parking means in this instance	Please establish what adequate parking means here either from referencing specific zoning requirements or by explicitly stating requirements here	Specific parking requirements and design will be subject to the certified <b>Zoning Code Chapter 26C Article XXXI. - Parking Regulations</b> and any applicable Sonoma Public Infrastructure standards.
PA-22	C-PA-2j	"Appropriate mitigation" seems undefined here Reference Policy C-OSRC-5b(6) to list mitigation measures	Please edit the following sentence to say: "For situations where impact avoidance is not feasible, appropriate <b>avoidance and minimization measures should be taken into consideration</b> including but not limited to, use of boardwalks, reducing trail width and protective fencing <b>to make the trail as LCP consistent as possible and is the least environmentally damaging alternative.</b> "	Mitigation measures and requirements are site specific and determined as part of the Coastal Development Permit process. Standards for mitigation will be developed during implementation as part of the Coastal Administrative Manual update.  Adopted Policy <b>C-PA-2j</b> references Policy <b>C-OSRC-8f</b> as requested.  <b>Policy C-PA-2j:</b> The Coastal Trail should be designed and located to minimize impacts to environmentally sensitive habitat areas consistent with <b>Policy C-OSRC-8f</b> . Where necessary to prevent disturbance to sensitive species, sections of the trail may be closed on a seasonal basis. Alternative trail segments shall be provided where feasible. For situations where impact avoidance is not feasible, appropriate mitigation measures should be incorporated, including but not limited to, use of boardwalks, reducing trail width and protective fencing.
PA-24	Coastal Permit Findings	This is policy language and should be incorporated as a policy	See original comment	This would be more appropriate to reiterate in the Administrative Manual which goes into more detail for permit processing.

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PA-25	C-PA-3a	Please include an explanation on how these development priorities were established. What is the relationship between development and acquisition? Consider grouping all policies that relate to the Public Access Plan together.	This is slightly clarified in this language "priority of development of public access facilities such as trails, visitor serving centers, etc. on the Sonoma County coast.", but still should be given more background.	Revised <b>Policy C-PA-3a</b> to provide more details on public access development priorities. These new policies include <b>Policy C-PA-3a, 3b, 3c, and 3d</b> .  <b>Policy C-PA-3a:</b> The Public Access Plan shall establish priority of development of public access facilities such as trails, visitor serving centers, etc. on the Sonoma County coast. <b>Policy C-PA-3b:</b> Require new development adjacent to public access and recreation areas vulnerable to coastal bluff erosion or sea level rise to be sited and designed to anticipate eventual loss and necessary replacement of such public access and recreation areas. <b>Policy C-PA-3c:</b> The distance between coastal access trails and residences should be as large as possible to protect the quality of the user experience and the privacy of the occupants of the residence. Access facilities shall be designed and managed to minimize conflicts with residential development. <b>Policy C-PA-3d:</b> Adopt a long-range plan or Master Plan for each facility that identifies and describes improvements necessary for continued operation, and <u>adaptation to sea level rise and climate change.</u>
PA-26	C-PA-3b		Please explain how these priorities were established, how were the first, second, and third tiers established?	<b>Policy C-PA-3a</b> references the Public Access Plan for establishing priority of development of such facilities.
PA-26	C-PA-3c	Please rephrase this policy, as the language is unclear as written. For guidance, from the HMB 2021 Certified LCP: <b>5-10 Mitigation for Impacts to Public Coastal Access.</b> <i>Where adverse impacts to existing public coastal access cannot be avoided by new development and no feasible alternative exists, ensure that impacts are mitigated such as through the dedication of a new access or trail easement in perpetuity or the provision of improvements to other public coastal access points in Half Moon Bay.</i>	Consider combining the second half of first 3c with the second 3c.	Added as a new policy:  <b>Policy C-PA-3g:</b> Where adverse impacts to existing public coastal access cannot be avoided by new development and no feasible alternative exists, ensure that impacts are mitigated by dedication of a new access or trail easement providing equivalent access, or a proportionate fee to develop or improve other public coastal access points identified as Priority 1 Development by the Public Access Plan.
PA-26	C-PA-3c	Please clarify, does this mean in lieu of? (off- site/similar character)	See original comment	Revised <b>Policy C-PA-3f</b> and added new <b>Policy C-PA-3g</b> to provide clarification  <b>Policy C-PA-3f:</b> Consider alternative mitigation measures for the impact of new development on public access in cases where development of certain public access facilities or improvements are found to be infeasible due to potentially significant impacts on public safety, agriculture, environmentally sensitive habitat areas, or cultural resources. Alternative mitigation measures include but are not limited to development of off-site public access points of equivalent public access opportunities. If off-site public access points are developed as mitigation for the impact of new development on public access, these access points shall be as close as feasible to the location of the impact on public access.  <b>Policy C-PA-3g:</b> Where adverse impacts to existing public coastal access cannot be avoided by new development and no feasible alternative exists, ensure that impacts are mitigated by dedication of a new access or trail easement providing equivalent access, or a proportionate fee to develop or improve other public coastal access points identified as Priority 1 Development by the <b>Public Access Plan</b> .
PA-27	C-PA-3g	This should be fleshed out more, why is this important? Cross reference visual resource chapter if needed.	See original comment	Visual analysis is required to preserve scenic quality of public views and should be considered when designing all aspects of facilities including parking. <b>Policy C-PA-3i</b>

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PA-29	Program C-PA-3		Please do not directly reference the California Coastal Commission 1993 "Guidelines for the Exclusion of Temporary Events from Coastal Commission Permit Requirements", instead make this program more general, and include the specifics in the IP update in the future.	Now <b>Program C-PA-2</b> . Programs are necessary or potential steps for implementation of the Local Coastal Program; for example, further study and development of plans of ordinances. BOS adopted LCP Public Access Element <b>Policy C-PA-3q</b> requires that Coastal Zoning Code permit requirements apply for temporary private events, and establishes thresholds for requiring a CDP for temporary private events.
PA-31	C-PA-4e	This policy should not just be limited to county residents, but to lower-income folks in general. Generally, this chapter seems to lack important policies on environmental justice. Consider adding more policies around EJ from the HMB Certified LCP such as: <b>5-3. Environmental Justice</b> . <i>Minimize barriers to public coastal access to the maximum extent feasible, including ensuring that public access and recreational opportunities account for the social, physical, and economic needs of all people.</i>	See original comment	BOS adopted LCP Public Access Element <b>Policy C-PA-4e</b> supports equitable access to the coast by requiring 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. Scenic resources are a coastal resource that would be considered during implementation.
PA-32	Private fee Access	As written the Public Access Plan does not contain any polices encouraging owners of fee accessways to continue to provide access, please provide policy language or an explanation in this chapter as to how the Public Access Plan establishes this.	Please be clear here that if a property owner is charging for an access point they would require a CDP.	Site and/or operational changes that would reduce access or create new barriers to coastal access have previously been interpreted by Sonoma County, Coastal Commission and the courts to need a Coastal Permit. In <i>Surfrider Foundation v. Martins Beach LLC</i> , the Court determined that any change in the public's ability to access the ocean, including closing an existing private fee accessway constitutes development and subject to a Coastal Development Permit.
WR-7	Total Maximum Daily Load Program	Please add more context as to what the Total Maximum Daily Load program is, what the program requires, and what the program includes.	See original comment	The BOS Adopted LCP Water Resources Element states: "The other major Clean Water Act program affecting the County in the future is the Total Maximum Daily Load (TMDL) program. The Regional Water Board is required to determine which surface water bodies are impaired, assess pollutant sources, determine acceptable levels, allocate allowable pollutant loads to various sources, and establish implementation programs."
WR-10	Objective C-WR-1.2	Please include a definition of pristine water, or the process that allows a body of water to be identified as pristine.	lease define unimpaired water, and pristine water. If possible, this element should contain a table that categorizes known bodies of water as impaired vs. unimpaired.	"Pristine waterbody" has been replaced with "unimpaired waterbody" in the BOS Adopted Draft. All coastal waterbodies other than the three waterbodies identified by the California Water Board as impaired in Sonoma County are considered unimpaired.
WR-10	Objective C-WR-1.2	Impaired surface waters should be defined in the introductory text of this section. Are there specific impaired water bodies in Sonoma County that this is referencing?	See original comment	Staff would be supportive of the following text revision: "Protect unimpaired waters, <b>as identified on the California Water Board's most recent Section 303(d) list</b> , and improve water quality of impaired surface waters, prioritizing watersheds which contain surface waters that are the most impaired, have the highest value for fish and wildlife, or are at most risk from future development. Introduction of the Water Resources Element discusses impaired waterbodies and identifies Russian River, Gualala River and Estero Americano as impaired waterbodies.
WR-12	C-WR-1e	Instead of a case-by-case basis there should be minimum parameters set defining the type of impact a development might have, such as, distance from water way, percentage of coverage for pervious surfaces. Sample Language from the Marin LCP states:	See original comment. In addition, please review this policy for clarity, as it is currently written this policy is difficult to understand.	Renumbered to <b>Policy C-WR-1f</b> in the BOS adopted LCP. See general response on Sonoma County Local Coastal Program organization. Specific standards will be developed as part of implementation (Coastal Zoning Code and Admin Manual).
WR-12	C-WR-1e(4)	This should be qualified. What specific types of design storms?	Please clarify is this only for a 24 hour storm event as is noted in e(3)?	Renumbered to <b>Policy C-WR-1f(4)</b> in the BOS adopted LCP. Policy applies to treatment control for all runoff, not just 24-hour storm event.

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WR-13	C-WR-1g(6)	Please define this timeline. Is this during development? Post Development? During construction window?	Please delete "soon as possible"	Renumbered to <b>Policy C-WR-1h(6)</b> in the BOS adopted LCP. Specific standards will be developed as part of implementation (Coastal Zoning Code and Admin Manual).
WR-15	C-WR-1k	Old policy: <b>Policy C-WR-1k:</b> Initiate a review of any sewer system when it persistently fails to meet applicable standards. On the basis of the failure of applicable standards, the County may deny new development proposals or impose moratoria on building and other permits that would result in a substantial increase in demand, and may impose strict treatment and monitoring requirements.	Please edit policy accordingly "...if the wastewater plant fails to meet standards set by the North Coast Regional Water Quality Control Board, prohibit new development proposals or impose moratoria on building and other permits that would result in a substantial increase in demand in all areas." In addition please include what the NCRWQCB is required to do when these plants fail to meet these standards.	Renumbered to <b>Policy C-WR-1l</b> in the BOS Adopted LCP: "Prohibit new development proposals or impose moratoria on building and other permits that would result in a substantial increase in demand in areas within Bodega Bay and The Sea Ranch that are served by municipal wastewater service if the wastewater plant fails to meet standards set by the North Coast Regional Water Quality Control Board." Authority of the NCRWQCB to regulate water quality in the Coastal Zone is established by California Coastal Act Section 30412(b): "The State Water Resources Control Board and the California regional water quality control boards are the state agencies with primary responsibility for the coordination and control of water resources."
WR-19	C-WR-2c	Missing additional details on the need for a Hydrologic study and some of the details on what is needed in that study. Language from previous versions: "Test wells may be required in Class 3 Groundwater Availability Areas. Discretionary applications in Class 3 and 4 Groundwater Availability Areas shall be denied unless a hydrogeologic report establishes that groundwater quality and quantity are adequate and will not be adversely impacted by the cumulative amount of development and uses allowed in the area, so that the proposed use will not cause or exacerbate an overdraft condition in a groundwater basin or subbasin or fractured rock aquifer. Procedures for proving adequate groundwater shall consider streamflow, groundwater overdraft, land subsidence, saltwater intrusion, and the expense of such study in relation to the water needs of the project."	Please include 2c below: Proof of groundwater with a sufficient yield and quality to support proposed uses in Class 3 and 4 Groundwater Availability Areas shall be required for discretionary permits. Test wells may be required in Class 3 Groundwater Availability Areas. Test wells or the establishment of community water systems to support new development in Class 4 Groundwater Availability Areas shall be required	Policy as adopted by BOS: <b>"Policy C-WR-2c:</b> Permit applications for new development that result in a net increase in groundwater use in a Class 3 and 4 Groundwater Availability Areas, or within a watershed that is designated as critical habitat for Steelhead or Coho Salmon shall be denied unless the applicant can demonstrate through a hydrogeologic report that the proposed use will not cause an adverse effect on groundwater resources of the groundwater basin, subbasin, or fractured rock aquifer, and associated stream levels. The hydrogeologic reports shall consider the following when evaluating impacts to groundwater resources: lowering of groundwater levels, reduction in groundwater storage, seawater intrusion, degradation of water quality, land subsidence, and depletion of interconnected surface water. The hydrogeologic report shall discuss if the development is consistent with an adopted groundwater sustainability plan or groundwater management plan, as applicable to the project site."
WR-21	N/A	(regarding sentence that starts with: "In light of..." at top of page) Please add more context on availability concerns	See original comment.	Availability will be determined by site-specific studies required by <b>Policies C-WR-3a</b> through <b>C-WR-3g</b> . Introductory section is intended to provide general background only.
WR-22	C-WR-3a	Please reference the specific standards here, or provide a link to an appendix with these standards.	See original comment.	State and Federal regulations regarding water quality are constantly evolving. Staff would be in support of making this an initiative rather than policy.
WR-23	C-WR-3c		Revise accordingly: "Require public water systems to prepare master facilities plans that contain, but are <b>not</b> limited to, the following items and information:..."	Policy as adopted by BOS: <b>"Policy C-WR-3c:</b> Require public water systems to prepare master facilities plans that contain, but are not limited to, the following items and information:"

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WR-23	C-WR-3c(2)	A master facilities plan should have a priority plan for water usages, with priority and non-priority usages in cases where water is limited. This is referenced in the Public Facilities and Services Chapter as well.	Please provide information related to future capacity if it is known and how this capacity will be divided, either within this element or by reference to the public facilities and services element,	Specific standards will be developed as part of implementation (Coastal Zoning Code and Admin Manual). BOS Adopted: <b>Program C-WR-1-P4</b> : Develop a program to facilitate tracking and maintaining consistency between the adopted Local Coastal Plan, adopted groundwater sustainability plans, urban water management plans, and the master facilities plans of public water suppliers. Such a program should include meetings between Permit Sonoma, public water suppliers, the North Coast Regional Water Quality Control Board and the California Coastal Commission to develop the tracking plan. As part of plan development, Permit Sonoma will review all proposed master facilities plans, and develop Local Coastal Plan amendments necessary to implement both the master facilities plans and the water resource tracking plan.
WR-25	C-WR-4a	<b>Policy C-WR-4a:</b> Require stormwater and wastewater disposal methods in accordance with all applicable Federal, State, and local regulations to avoid or minimize reliance on discharges into natural waterways. Another policy: Where applicable, comment on projects and environmental documents to ensure that low impact development practices and reclamation, conservation, and reuse programs are protective of surface and groundwater resources. (GP2020)	Please include this policy. In addition, this policy addresses two separate things and should be split into two policies	Compliance with applicable Federal, State, and local regulations does not require a policy, as this is a legal requirement regardless of LCP policy. Procedures for Project Review may be considered with the Implementation Plan, Administrative Manual.
WR-26	C-WR-4g	Not actionable as written	Please add at end of policy "...runoff and erosion if <b>landscaping is proposed as part of a CDP</b> "	Renumbered to <b>Policy C-WR-4f</b> in BOS adopted LCP. Requirement to reduce erosion and runoff is requirement of all landscaping, not just landscaping associated with a CDP.
WR-26	C-WR-4i	Not Actionable as written	Please change language from encourage to something more actionable.	"Encourage" is used because LCP policy lacks authority to establish utility rates and billing practices of public utilities.
PS-10	C-PS-1f	"Best available science" needs to be described in this chapter: "The best available, up-to-date scientific information about coastal hazards and sea level rise shall be used in vulnerability assessments, the evaluation of coastal development permit applications that present hazard risks, and the preparation of technical reports and related findings. Analyses shall include multiple sea level rise scenarios, one of which is a worst-case "high" projection for the planning horizon or expected duration of the proposed development <b>[insert the minimum anticipated duration of development, e.g., (minimum 100 years unless otherwise specified)]</b> , based on best available scientific estimates of expected sea level rise at the time of the analysis. Sources of information may include, but shall not be limited to, state and federal agencies, research and academic institutions, and non- governmental organizations, such as the California Coastal Commission (CCC), Ocean Protection Council (OPC), National Oceanic and Atmospheric Administration (NOAA), the National Research Council, and the Intergovernmental Panel on Climate Change."	Please include: "Analyses shall include multiple sea level rise scenarios, one of which is a worst- case "high" projection for the planning horizon or expected duration of the proposed development <b>[insert the minimum anticipated duration of development, e.g., (minimum 100 years unless otherwise specified)]</b> , based on best available scientific estimates of expected sea level rise at the time of the analysis."	The BOS adopted LCP has an introduction section "Sea Level Rise Forecasts" that discusses development of scientific information on climate change and sea level rise to help guide planning and decision-making. This section also provides background on which model Sonoma County prefers, and how this sea level rise forecast is applied to evaluating vulnerability of development to sea level rise. BOS adopted LCP Public Safety Element <b>Policy C-PS-1f</b> defines best available science as: "Recently published scientific information about coastal hazards and sea level rise that be used in vulnerability assessments, evaluation of coastal development permit applications that present hazard risks, and preparation of technical reports and related findings. Sources of information may include, but shall not be limited to, state and federal agencies, research and academic institutions, peer-reviewed scientific journals, and research published by organizations that focus on climate change and sea level rise, such as the California Coastal Commission, Ocean Protection Council, and the Intergovernmental Panel on Climate Change."
PS-12	C-PS-1h	We recommend tying this to something, as otherwise this is unlikely to be implemented. In our staff-to- staff meeting, we should discuss the intent of this policy and how the County envisions homeowners using this.	See original comment. Consider tying this requirement to a CDP for Property owners in mapped hazard/flood areas	BOS adopted LCP Public Safety Element <b>Policy C-PS-1h</b> clarifies that property owners are responsible for understanding risks associated with living on the coast. It is not intended to be a requirement for CDP application.



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PS-12	C-PS-1i	As discussed in cover letter, this is not defined. There needs to be a consistent definition between blufftop redevelopment and redevelopment. Recommend using "redevelopment" or "coastal redevelopment." This measures redevelopment from the effective of the Coastal Act.	See original comment	The glossary in the BOS adopted LCP defines coastal redevelopment as: "Coastal Redevelopment: Development located between public trust lands and a point 100 feet inland of the top of a coastal bluff, adjoining or near the ocean and land interface, or at very low-lying elevations along the shoreline that consists of: 1) additions to an existing structure; 2) exterior or interior renovations; or 3) demolition of an existing bluff top home or other principal structure, or portions thereof, which results in: (1) Alteration of 50 percent or more of major structural components including exterior walls, floor and roof, and foundation; or a 50 percent increase in floor area. Alterations are not additive between individual major structural components; however, changes to individual major structural components are cumulative over time from the effective date of the Coastal Act (January 1, 1977). (2) Demolition, renovation, or replacement of less than 50 percent of a major structural component where the proposed alteration would result in cumulative alterations exceeding 50% or more of a major structural component, taking into consideration previous alterations approved on or after the effective date of the Coastal Act (January 1, 1977); or an alteration that constitutes a less than 50 percent increase in floor area where the proposed alteration would result in a cumulative addition of greater than 50 percent of floor area, taking into consideration previous additions approved on or after the effective date of the Coastal Act(January 1, 1977).
PS-18	Slope Stability Analysis	Please make slope stability analysis a separate policy or define it explicitly as: "A quantitative slope stability analysis prepared by a geotechnical engineer demonstrating a minimum factor of safety against sliding of 1.5 (static) or 1.2 (pseudostatic, k=0.15). Safety and stability must be demonstrated for the predicted position of the bluff and blufftop edge following bluff recession over at least 100 years, considering both historical data and the influence of future sea level rise."	See original comment One suggestion would be to insert this as a subset of policy 2b.	Standards for slope stability will be established during implementation and will be periodically reviewed when there are significant changes in data or improved scientific understanding of landslide hazards in the Coastal Zone.
PS-20	Objective C-PS-2.3	This should better mirror Coastal Act Section 30235 to provide details on when SPD is allowable, avoidance measures, and required mitigation for such devices.	Please include policy language to support this objective.	BOS adopted LCP Public Safety Element <b>Policy C-PS-2g</b> refers to <b>Appendix F</b> , which establishes standards for the construction, reconstruction, expansion, alteration, and/or replacement of a shoreline protective device, including seawalls, revetments, breakwaters, groins, bluff retention devices, deep piers/caissons and other shoreline protection structures for coastal erosion control and hazards protection.
PS-20	C-PS-2b(d)	Need to define what acceptable level means	See original comment.	Determination of acceptable risk is the responsibility of the licensed Geotechnical Engineer, Engineering Geologist, or Geophysicist evaluating the project.
PS-21	C-PS-2d	As stated previously the following should also be calculated in determining the bluff setback. Please include this standard: A quantitative slope stability analysis prepared by a geotechnical engineer demonstrating a minimum factor of safety against sliding of 1.5 (static) or 1.2 (pseudostatic, k=0.15). Safety and stability must be demonstrated for the predicted position of the bluff and blufftop edge following bluff recession over at least 100 years.	See original comment.	Determination of acceptable risk is the responsibility of the licensed Geotechnical Engineer, Engineering Geologist, or Geophysicist evaluating the project. The LCP cannot regulate practice of engineering by licensed professionals. <b>Policy C-PS-2d</b> requires certification by the licensed professional that the proposed development has a design life of 100 years. This evaluation is required to consider the specific geologic and hydrologic conditions on the site; historic coastal bluff retreat data; projections for future sea level rise according to the best available science; and existing and projections for changes in storm frequency, magnitude, and duration due to climate change.



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PS-21	C-PS-2d		Please edit accordingly "Shoreline protection devices are prohibited for new development <b>except for coastal dependent uses</b> and shall not be considered when evaluating setback from coastal hazards"	BOS adopted LCP Public Safety Element <b>Policy C-PS-2d</b> is more restrictive than required by the Coastal Act. Coastal dependent uses will require relocation as the shoreline moves inland and does not support shoreline protective devices for any development, including those that are coastal dependent.
PS-21	C-PS-2e	Regardless of feasibility of other alternatives, shoreline protection devices still need to go through a full coastal act review. This is language from the 2021 certified Half Moon Bay LUP on when Shoreline Protective devices are allowable: "To protect an existing structure in imminent danger from erosion (i.e., when substantial evidence indicates that the structure will be significantly damaged by coastal flooding or erosion hazards within two to three storm cycles, or approximately three years); when found to be the least environmentally damaging feasible alternative (e.g., if relocation or soft armoring approaches cannot mitigate the hazard); and when all coastal resource impacts are appropriately and proportionally mitigated. If allowed shoreline protective devices shall be sited and designed to avoid impacts to coastal resources to the maximum extent feasible, including through preserving the maximum amount of existing beach, protecting lateral public access along the shoreline, protecting and enhancing public views, minimizing alteration of and visually blending with the surrounding natural shoreline; avoiding impacts to archaeological resources; and not encompassing an area larger than that necessary to protect the coastal-dependent use, existing structure, or critical facility."	This updated policy seems to be missing some key elements and needs to be updated to accurately portray when a SPD is allowed. Please review the sample policy language and make sure all elements are incorporated.	BOS adopted LCP Public Safety Element <b>Policies C-PS-2e, C-PS-2g, and CT-PS-2h</b> only allow shoreline protection devices as a last resort, and does not allow restoration of development potential lost due to natural forces. There is no policy exempting shoreline protective devices from the provisions of the Coastal Act or the need for a Coastal Permit.
PS-22	C-PS-2h	Updated to follow guidance, however, ese redevelopment here, should be Coastal redevelopment if that's the term they want to go with.	Please define redevelopment in this element.	BOS adopted LCP Public Safety Element <b>Policy C-PS-2h</b> establishes standards for removal of shoreline protective devices and restoration of the site to a natural condition when the protected structure is no longer present or no longer requires armoring and the device is not needed to protect adjacent development that is still entitled to shoreline armoring. Consistent with the LCP Glossary, Permit Sonoma staff would support the following change to <b>Policy C-PS-2h</b> : "In the case of <b>coastal</b> redevelopment, any potential rights to protection are terminated and removal of the shoreline protective device shall be required as part of <b>demolition and alteration of the structure being redeveloped.</b> "
PS-26	PS Objectives	Another goal or objective should be to collaborate with neighboring coastal counties (Mendocino and Marin) to effectively leverage resources.	See original comment.	Sonoma County flooding is primarily on the Russian River, where flood control projects are located outside of the Coastal Zone. Coastal flooding due to storm surge and wave runup occurs statewide, and mutual aid agreements are beyond the scope of the LCP. Flood-prone watersheds in Sonoma, Mendocino, and Marin Counties do not overlap, and it is not clear if opportunities for collaboration on flood mitigation policies can be identified. Existing mutual aid agreements between the counties assure a unified response to large disasters and are not specific to the Coastal Zone.
PS-26	C-PS-3.1	See previous comment re: "acceptable levels"	See original comment.	Specific standards for flood risk will be developed as part of implementation (Coastal Zoning Code and Admin Manual).

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PS-26	C-PS-3.2	Policy should describe how reduction of repetitive property loss will be accomplished.	This is partially accomplished in Policy 3k, but should be more specific, would this be part of a projects permit conditions of approval?	Specific standards for flood risk evaluation will be developed as part of implementation (Coastal Zoning Code and Admin Manual) and are guided by <b>Policy C-PS-3k</b> . The certified Coastal Zoning Code has existing provisions which may be updated through implementation ( <b>Article XX. - F1—Floodway Combining District, and Article XXI. - F2—Floodplain Combining District</b> ).
PS-27	C-PS-3b	In-line edits	Please incorporate these previous in- line edits: <b>Policy C-PS-3b</b> : Floodplain management shall be given priority over flood control structures for preventing property damage from flooding, except for flood control projects where no other measure is feasible AND where protection is necessary for public safety or to protect existing development, , and such structure complies with requirements of the California Coastal Act and shoreline protection structure requirements of this Public Safety Element. (GP2020)	BOS adopted LCP Land Use Element General Land Use <b>Policies C-LU-1a</b> through <b>C-LU-1c</b> require all development to be consistent with the California Coastal Act. Specific standards for allowing flood control structures will be developed as part of implementation (Coastal Zoning Code and Admin Manual) and are guided by <b>Policy C-PS-3b</b> . The certified Coastal Zoning Code has existing provisions which may be updated through implementation ( <b>Article XX. - F1—Floodway Combining District, and Article XXI. - F2—Floodplain Combining District</b> ).
PS-27	C-PS-3d	In line edits	Please incorporate previous in-line edits	General Land Use Policies <b>C-LU-1a</b> through <b>C-LU-1c</b> require all development to be consistent with the California Coastal Act. Specific standards to regulate development within floodplains will be developed as part of implementation (Coastal Zoning Code and Admin Manual) and are guided by <b>Policy C-PS-3d</b> .The certified Coastal Zoning Code has existing provisions which may be updated through implementation ( <b>Article XX. - F1—Floodway Combining District, and Article XXI. - F2—Floodplain Combining District</b> ).
PS-27	C-PS-3f	Not necessarily here, but would recommend addressing somewhere that drainage/stormwater mgmt. (and related policies) should account for increased water as a result of SLR and other climate change impacts.	See original comment.	The BOS adopted LCP <b>Public Safety Element Section 4 "Sea Level Rise Hazards"</b> provides policy regarding increased water levels. Stormwater management is regulated by the North Coast Regional Water Quality Control Board. Authority of the NCRWCB to regulate water quality in the Coastal Zone is established by California Coastal Act Section 30412(b): "The State Water Resources Control Board and the California regional water quality control boards are the state agencies with primary responsibility for the coordination and control of water resources."
PS-28	C-PS-3g	Should specify: 1) That foodbank setback should be adhered to unless risk has been minimized and impacts to coastal resources have been avoided or minimized to the maximum extent feasible; 2) Whether this policy would apply to redevelopment in flood hazard areas along the shoreline (ocean and riverine); and 3) Would recommend this setback be based on expected risk in the event that >100-ft setback is needed.	See original comment.	Specific standards will be developed as part of implementation (Coastal Zoning Code and Admin Manual). Specific development standards for floodway and floodplain setbacks can be found in the certified Sonoma County Coastal Zoning Ordinance <b>Article XX. - F1—Floodway Combining District, and Article XXI. - F2—Floodplain Combining District</b> . These standards will be reassessed during implementation of the updated Sonoma County Local Coastal Plan.
PS-28	C-PS-3h	See previous comments re: "acceptable levels"	See original comment.	Specific standards will be developed as part of implementation (Coastal Zoning Code and Admin Manual). Specific development standards for floodway and floodplain setbacks can be found in the certified Sonoma County Coastal Zoning Ordinance <b>Article XX. - F1—Floodway Combining District, and Article XXI. - F2—Floodplain Combining District</b> . These standards will be reassessed during implementation of the updated Sonoma County Local Coastal Plan.

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PS-28	C-PS-3j	In line edit, should say:	Please incorporate previous in-line edit as such: Tentative and final subdivision maps and approved site plans shall show areas subject to flooding as designated on the Flood Rate Maps adopted by the FEMA <b>except where more detailed parcel-specific and site-specific analyses of flood elevations and flood hazard zones based on scaled interpretations of the Flood Rate Maps are available</b>	Specific standards will be developed as part of implementation (Coastal Zoning Code and Admin Manual). Specific development standards for floodway and floodplain setbacks can be found in the certified Sonoma County Coastal Zoning Ordinance <b>Article XX. - F1—Floodway Combining District, and Article XXI. - F2—Floodplain Combining District</b> . These standards will be reassessed during implementation of the updated Sonoma County Local Coastal Plan.
PS-30	Sea Level rise forecasts	No Comment	Please explain under what scenario this sea level rise forecast was made	Pages PS-30 and PS-31 of the BOS adopted LCP Public Safety Element Section 4 "Sea Level Rise Hazards" contain an extensive discussions of forecast models and why a 7-foot sea level rise was used to assess impacts from sea level rise.
PS-33	Table C-PS-2		If possible, please also include a list of private residences that are under risk from 7ft sea level rise	This table is intended to show major infrastructure that is at risk from sea level rise. Assessment of individual residences is beyond the scope of the Local Coastal Plan, but may be considered during implementation of the Local Coastal Plan. BOS adopted LCP Public Safety Element <b>Programs C-PS-4-P1, C-PS-4-P2, and C-PS-</b>
PS-35	Exposure to inundation and erosion	(regarding the 2030 sea- level rise) This should note the amount of SLR analyzed rather than just the year.	Please include a legend into all SLR figures that say amount and range of SLR.	Maps will be finalized post Local Coastal Plan certification with the most recent Calfire information in addition to local response areas.
PS-37	C-PS-4.1	See previous comment on acceptable levels	See original comment.	Specific standards will be developed as part of implementation (Coastal Zoning Code and Admin Manual). Specific development standards for floodway and floodplain setbacks can be found in the certified Sonoma County Coastal Zoning Ordinance <b>Article XX. - F1—Floodway Combining District, and Article XXI. - F2—Floodplain Combining District</b> . These standards will be reassessed during implementation of the updated Sonoma County Local Coastal Plan.
PS-37	C-PS-4.1	Please indicate how a project specific threshold would be determined	See original comment.	Specific standards will be developed as part of implementation (Coastal Zoning Code and Admin Manual). Specific development standards for floodway and floodplain setbacks can be found in the certified Sonoma County Coastal Zoning Ordinance <b>Article XX. - F1—Floodway Combining District, and Article XXI. - F2—Floodplain Combining District</b> . These standards will be reassessed during implementation of the updated Sonoma County Local Coastal Plan.
PS-37	C-PS-4.2	As previously discussed, existing development should be defined as pre-Coastal Act development., see previous comments on acceptable levels	See original comment.	This objective applies to all existing development, both permitted with a CDP and pre-Coastal Act development. <b>Appendix F "Shoreline Protection Structure Guidelines"</b> provides standards for construction, reconstruction, expansion, alteration, and/or replacement shoreline protective devices.

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PS-37	C-PS-4b, 4f, 4k	New policy	Please also include that these SLR numbers should also be based on best available science at a med-high risk scenario	The BOS adopted LCP Public Safety Element <b>Section 4 "Sea Level Rise Hazards"</b> contains an extensive discussions of forecast models and why a 7-foot sea level rise was used to assess impacts from sea level rise. See <b>Policies C-PS-4d and -4e:</b> <b>Policy C-PS-4d:</b> Update hazard data every 3 years or at intervals recommended by responsible agencies, whichever is more frequent, using the best available scientific estimates, aligning with projections used by regional, state and federal agencies. <b>Policy C-PS-4e:</b> Use the best available science and technical analyses available in combination with site-specific information when evaluating land use or development proposals in areas subject to sea level rise and other coastal hazards.
CT-10	REMOVED POLICY	<b>Policy C-CT-2b:</b> Provide convenient, accessible transit facilities for youth, seniors, and persons with disabilities, and paratransit services as required by ADA. Promote efficiency paratransit service such as use of joint maintenance facilities. (NEW) and cost effectiveness in	This policy was removed, and seems to be an important policy to include to support transit facilities. Please provide an explanation for why it was removed.	Compliance with applicable Federal, State, and local regulations does not require a policy, as this is a legal requirement regardless of LCP policy. For local context all transit support facilities are located outside of the Coastal Zone and no opportunity for joint maintenance can be identified within the Sonoma County Coastal Zone.
CT-10	Objective CT-2.5	Is this referencing Appendix H? If so, this should be cited here. If it's a new document, if it contains relevant information to this chapter it should be included in the appendix.	See original comment.	<b>Objective C-CT-2.5</b> should be corrected: "Develop bicycle and pedestrian facilities consistent with the Sonoma County Bicycle and Pedestrian Plan ( <b>Appendix H</b> ), LCP Public Access Plan( <b>Appendix B</b> ), and adopted State and County park master plans to provide alternatives to automobile use.
CT-12	Objective CT-3.1	We should strive for a regional vision for a bike network including bike transportation highways. Ultimately a map/figure of this vision would be ideal.	See original comment.	<b>Figures C-CT-1a, C-CT-1b, and C-CT-1c</b> show the existing and proposed bicycle transpiration network. Consistent with the Complete Streets Act of 2008, Sonoma County shows bicycle facilities as part of the overall transportation system. The Countywide Bicycle and Pedestrian Plan, maintained by Sonoma County Transportation Authority establishes a regional vision for bicycle connectivity that extends beyond the Coastal Zone.
CT-13	CT-3a/3b		The "Sonoma County Bicycle and Pedestrian Plan" is referenced in these policies, but it's unclear what this plan is or where to locate it. Please cite appropriately.	The Sonoma County Bicycle and Pedestrian Plan is included as <b>Appendix H</b> in the BOS adopted LCP, and will be referenced in <b>Objective C-CT-2.5</b> (see above).
CT-13	(General Comment) on "The following policies shall be used to achieve these objectives	These polices should include: 1. Allowing bike turnouts/climbing lanes on steep climbs and blind curves, where appropriate. 2. The possible installation of bike safety signs (e.g. "Pass 3ft min" etc.) in limited numbers when balanced with visual impacts. 3. Bike pull-overs/rest stop improvements. This may be a general point that bike and ped path improvements should include rest areas especially in highly scenic locations in parks, above beaches, or scenic pull-outs with sufficient room.	See original comment.	Policies requiring turn outs, bicycle climbing lanes, and bicycle rest stops are contained in <b>Appendix J "Caltrans Final Sonoma County Route 1 Repair Guidelines" Table 5-1</b> . These features are also required by the 2010 Sonoma County Bicycle and Pedestrian Plan and the Sonoma County General Plan 2020. <b>Policies C-CT-3n through C-CT-3q</b> require development to be consistent with the Sonoma County Bicycle and Pedestrian Plan.

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CT-13	CT-3b	At the moment the Bicycle and Pedestrian plan is just a list of projects and does not include any policies or design guidelines. This should also be cited as Appendix H	See original comment.	BOS adopted LCP Circulation and Transit Element policy <b>C-CT-3a and C-CT-3b</b> require consistency with the Sonoma County Bicycle and Pedestrian Plan, LCP Public Access Plan, and adopted State and County park master plans. <b>Appendix H</b> is provided as a list of specific improvements within the Coastal Zone.
CT-14	CT-3l	Please insure that this policy aligns with Caltrans Sonoma State Route 1 Repair Guidelines.	See original comment.	<b>Appendix J "Caltrans Final Sonoma County Route 1 Repair Guidelines" Table 5-1</b> requires bridge projects to provide a 6-foot shoulder for bicyclists. This is consistent with BOS adopted LCP Circulation and Transit policy <b>C-CT-3l</b> .
CT-14	CT-3i(2)		Please edit accordingly "Routes and bikeway design shall be ADA compliant <b>where feasible.</b> "	ADA is a Federal regulation and compliance is mandatory and enforced through the Building Code.
CT-19	CT-4c	Why not repair and maintenance of 116?	Is there a reasoning why this is just highway one?	Comment refers to an earlier version of the Sonoma County LCP. BOS adopted LCP Circulation and Transit <b>Policy C-CT-4c</b> : "The following policies apply to Highway 1 and Highway 116 within the Coastal Zone: (1) Repair and maintenance of Highway 1 shall be consistent with 2019 Caltrans "Sonoma State Route 1 Repair Guidelines" found in <b>Appendix K</b> . (2) Prohibit development of new driveways along Highway 1 and Highway 116 except where reasonable access cannot be provided by using existing driveways or local roads for access. (3) Set and enforce access standards for new driveways and other encroachments to the Arterial Road system. These standards may include functional layout, location, and spacing requirements to minimize side frictions. (4) In agricultural areas, include measures such as road signs, wider shoulders, and turnouts or over/under passes to provide safer roads for the agricultural industry, residents, and visitors where compatible with the character of the area, does not impede public access, and does not impact other sensitive coastal resources.
CT-19	Roadway Safety improvements	A general overview of the safety improvements referenced here would be helpful, especially since we are asking Caltrans to make design exemptions for safety improvements.	See original comment.	<b>Policy C-CT-4f</b> : Road improvements intended to improve safety, especially for pedestrians, bicyclists, and users of public transit, shall be given funding priority over capacity improvements.  Any new improvements must be consistent with any Caltrans and Sonoma Public Infrastructure standards.
PF-0			Please fix page numbers in this element	Comment refers to an earlier version of the Sonoma County LCP. Page numbering of the BOS adopted LCP Public Facilities and Services Element is consistent and does not contain duplicates or missed page numbers.
PF-7	Program C-PF-1c:		Should this be a policy?	Revised "Program" to "Policy". <b>Policy C-PF-1c</b> : Install charging stations for, electric, or other alternative fuel vehicles at public facilities and other visitor serving uses, and park facilities where compatible.

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PF-8	2. Water and Wastewater Treatment Facilities	This chapter should include a discussion of Coastal Act priority uses (Coastal-dependent uses, visitor- serving commercial uses, coastal access and recreational facilities, and agricultural uses) and that water supply and wastewater treatment for these priorities take precedent, consistent with Coastal Act Section 30254. This discussion should also relate the Coastal Act development priorities with non-priority development, and how future water connections and wastewater treatment capacities will be distributed between these different priorities.	See general comment letter.	Coastal Act references can be found at the beginning of the Public Facilities and Services Element.  Section 30254.5 Terms or conditions on sewage treatment plant development; prohibition. Notwithstanding any other provision of law, the commission may not impose any term or condition on the development of any sewage treatment plant which is applicable to any future development that the commission finds can be accommodated by that plant consistent with this division. Nothing in this section modifies the provisions and requirements of Sections 30254 and 30412.
PF-11	Table C-PF-1	Please label which systems in the table are public or private. In addition, the title of the table should be changed since "Characteristics of Public Water Systems" implies that this table does not include private water systems.	See original comment.	The Sonoma County coast has about 16 water systems that fall under the regulatory authority of the California Water Resources Control Board as a "public water system", ranging in size from The Sea Ranch Water Company, a Community system with 1,872 connections; to the Blue Heron Restaurant, a Non-Community Transient system with one connection. <b>Table C-PF-1</b> provides general information about the public and private water systems on the coast and uses system classification consistent with Section 116275 of the California Safe Drinking Water Act which is contained in Part 12, Chapter 4 of the California Health and Safety Code.
PF-11	Table C-PF-1	If data is available, please include another column that describes the capacity available to serve vacant lots/lots not served, e.g. the number of connections available in vacant lots	See original comment.	The water systems fall under the regulatory authority of State Water Resources Control Board Division of Drinking Water. Any data available can be accessed through the State.
PF-16	Policy C-PF-2a	There should be a discussion outlining Coastal Act priority uses and non-priority uses in this element. Priority uses are explained in the Land Use element, but not specifically in relation to public facilities and services.	See general comment letter.	Comment may refer to an older version of this policy. BOS adopted LCP Public Facilities Element <b>Policy C-PF-2a</b> : Growth and development shall be planned in accordance with existing water and wastewater treatment and disposal capacities. Development, including land divisions, shall be prohibited unless a master plan consistent with <b>Policy C-PF-2d</b> identifies adequate water and wastewater treatment and disposal capacities and facilities to accommodate such development. In acting on any Coastal Development Permit, determine that adequate capacity is available and reserved in the system to serve priority land uses as shown in Land Use Element <b>Table C-LU-1</b> . In areas with limited service capacity, new development for a non-priority use, including land divisions, is prohibited unless adequate capacity remains for Coastal Act priority land uses within the service area.
PF-16	Policy C-PF-2a	(Regarding the last sentence: " <i>In areas with limited service capacity, new development for a non- priority use, including land divisions, is prohibited unless adequate capacity remains for Coastal Act priority land uses within the service area.</i> ") How will this be determined? Based on what? There needs to be more data and discussion on what capacity of water currently exists for future development. Specifically, this policy should lay out how and through what studies or application requirements development will prove that it has adequate water capacity to serve it, as well as how it will assure that adequate capacity remains for Coastal Act priority uses.	See original comment. How does the county determine that adequate capacity is available?	Adequacy of municipal water supplies is ultimately determined by the State Water Resources Control Board, consistent with California Coastal Act Section 30412(b): "The State Water Resources Control Board and the California regional water quality control boards are the state agencies with primary responsibility for the coordination and control of water resources." <b>Table C-PF-1</b> shows current capacity of public water system in the Coastal Zone based on information provided by California Water Resources Control Board Division of Drinking Water. <b>Policy C-PF-2d</b> identifies requirements for providing information from these master plans to the County.  The standards for establishing thresholds for allocating available capacity will be determined during implementation of the updated Sonoma County Local Coastal Plan.



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PF-16	Policy C-PF-2d		What about current facilities? This seems to only address when facilities are being expanded or improved. The sentence "In the event that a master plan or monitoring fails to show adequate facilities or supplies for existing development, zoning changes, building permits, or other entitlements in order to protect services to existing residents." Does not make sense as written. Should it say "enact zoning changes"?	<b>Policy C-PF-2d</b> was carried over from General Plan <b>Policy PF-1b</b> , and the two policies are intended to be consistent with each other.  Suggested change for consistency (bold is GP2020 text): "Master plans or equivalent documentation shall be prepared for all water and wastewater management systems prior to approval of facility expansion or improvement projects. All facilities shall be designed and constructed in accordance with the existing and planned development in the applicable jurisdictions. In the event that a master plan or monitoring fails to show adequate facilities or supplies for existing development, <b>consider moratoria on</b> zoning changes, building permits, or other entitlements in order to protect services to existing residents."
PF-17	Policy C-PF-2f		Please fix policy labeling	Policy labeling is correct in the BOS adopted LCP Public Facilities and Services Element. Comment appears to refer to an earlier LCP draft.
PF-18	Policy C-PF-2f(3)	Please qualify this statement. Which organizations are providing certifications?	This was edited to say master facility plan instead, however it seems that master facility plans are only required for NEW or expanded facilities per Policy 2d.	Comment references a policy number found in an earlier version of the LCP. BOS adopted LCP Public Facilities and Services <b>Policy C-PF-2d</b> requires a master facilities plan to be submitted prior to improvement or expansion of a facility. Master facilities plans for existing water and wastewater systems are required by the California Public Utilities Commission for investor-owned (private) facilities, and by the California Department of Water Resources for public water districts.
CH-0		Please also include a policy on the process for if there is discovery of archaeological or paleontological resources. <b>Sample language from the Half Moon Bay Certified LCP:</b> Discovery of Archaeological and Paleontological Resources. Regardless of site location, require all development to halt work if subsurface archaeological or paleontological resources are discovered during construction. The developer shall notify the City and retain a qualified professional to identify any necessary handling and notification procedures and mitigation measures. Work shall not resume until these measures have been reviewed and approved by the City and all appropriate entities have been notified. Consult with the appropriate Native American tribe(s) on appropriate avoidance and mitigation measures."	See original comment.	<b>Policy C-CH-1g</b> references applying standard conditions requiring notification and evaluation in the event of the discovery of a burial or suspected human remains or other cultural resources. These standard conditions are applied to all discretionary projects. Conditions may change depending on responses during formal consultation however this sets the minimum standard language for all Conditions of Approval.
CH-3	C-CH-1a	Please include an overview of the Northwest Information Center at Sonoma Center in the introduction.	See original comment.	Background on Northwest Information Center at Sonoma State University was not included because the Board did not direct us to include more details on this. The Northwest Information Center is one of the nine information centers affiliated with the State of California Office of Historic Preservation (OHP) in Sacramento.

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CH-3	C-CH-1c	<p>This policy is a good start, but there should be a complementary policy that requires monitoring when a site is identified to have archaeological or paleontological resources.</p> <p><b>Example language from HMB certified LCP:</b> In addition, consider including in the IP or appendix, standardized monitoring requirements for development projects like these. Archaeological and Paleontological Resources Monitoring. Require, where a pre- development survey identifies the potential to affect known or newly discovered archaeological, Native American, or paleontological resources, the submittal of a monitoring and reporting plan that identifies methods and describes the procedures for selecting archeological and Native American monitors and procedures that will be followed if additional or unexpected resources are encountered during development of the site.</p> <p>Procedures may include, but are not limited to, provisions for cessation of all grading and construction activities in the area of the discovery that has any potential to uncover or otherwise disturb cultural deposits in the area of the discovery and all construction that may foreclose mitigation options to allow for significance testing, additional investigation and mitigation.</p>		<p>BOS adopted LCP Cultural Resources Element policies require coastal development projects to identify, preserve, and protect historic and Tribal cultural resources, sacred sites, places, features, and objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites. Specific standards and procedures for protecting these resources will be implemented in the Coastal Administrative Manual.</p> <p><b>Policy C-CH-1g</b> references applying standard conditions requiring notification and evaluation in the event of the discovery of a burial or suspected human remains or other cultural resources. These standard conditions are applied to all discretionary projects. Conditions may change depending on response from the Tribes. Permit Sonoma will continue to work with the Tribes for conditions applying to all projects.</p>