

**CALIFORNIA COASTAL COMMISSION**

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# W17a

Appeal Filed: 7/8/2013  
Substantial Issue Found: 4/15/2015  
Staff: Nancy Cave - SF  
Staff Report: 4/1/2016  
Hearing Date: 4/13/2016

## STAFF REPORT: DE NOVO HEARING

**Application Number:** A-2-SON-13-0219

**Applicant:** California Department of Parks and Recreation

**Location:** Eight different existing free public parking lots within Sonoma Coast and Salt Point State Parks located along 35 miles of the Sonoma County coastline. Four of the parking lots are located at Goat Rock (the North Goat, South Goat, Blind Beach, and Arched Rock parking lots), two of the parking lots are located at Bodega Head (the East Bodega and West Bodega parking lots), one is located at Shell Beach and one is located at Stump Beach.

**Project Description:** Install automatic pay parking machines (self-pay devices charging an \$8 fee per day), signage, sign posts, gates, bollards, ADA parking spaces, and related parking lot improvements and trail connectors at each of the eight parking areas.

**Staff Recommendation:** Denial

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## SUMMARY OF STAFF RECOMMENDATION

The California Department of Parks and Recreation (hereinafter “State Parks”, “Parks”, “DPR”, or “the Applicant”) proposes to implement a fee collection program by proposing to install self-service automatic payment parking machines (charging an \$8 fee per day), as well as signs, gates, parking lot improvements, bollards, and related development (including ADA improvements and some trail repairs) at eight different parking lot facilities within Sonoma Coast and Salt Point State Parks located along some 35 miles of the Sonoma County coastline.

Currently all of these eight parking lot areas provide free public parking. Thus, DPR's proposed project would make use of these parking areas fee-based for the first time as opposed to free as they currently exist. DPR indicates that the purpose of the program is to increase revenues within these two state parks to help offset the cost of maintenance and resource protection activities.

The proposed project is located within Sonoma County's coastal development permit (CDP) jurisdiction, and it is important to understand how it comes to be in front of the Commission at this time. In 2012, DPR submitted a CDP application to the County. That project differed significantly from the project currently pending in front of the Commission in that it was a proposal to install iron rangers (basically iron tubes set in the ground) at 13<sup>1</sup> State Park parking lot facilities in the same two-park area, including all of the 8 parking lots currently proposed. The original project did not, however, include a fee component. In other words, although it was presumed that at some point in time the 13 iron rangers would be used for fee collection, DPR did not propose a fee program to the County, including indicating to the County their position that a future decision to collect fees would not be subject to County review or CDP requirements.

Ultimately, the Sonoma County Board of Supervisors unanimously denied DPR's proposed iron rangers project, citing Coastal Act public access and recreation inconsistencies as well as LCP inconsistencies. State Parks appealed the County's denial to the Coastal Commission. The Commission considered Parks' appeal at its meeting on April 15, 2015, and at that time the Commission found that the appeal raised a substantial issue,<sup>2</sup> thus taking jurisdiction over the CDP application.<sup>3</sup> Although the Commission found no substantial issue on almost all of the appeal contentions submitted by DPR, the regional and statewide significance of the issues in play were identified as the key issue at that time. The Commission found:

*The overarching and substantial concern in this appeal is the regional and statewide significance of the issues at hand, given the fundamental role of State Parks in the management of the Sonoma County State beaches and all State beaches located along the California coast, and State Parks' reliance on revenue generation to support its operations at these State coastal beaches. Although it could be argued that the County's denial decision appropriately protects these regional and statewide resources of significant importance, it is difficult to dismiss that the decision affects not only these Sonoma Coast areas, but also State Parks overall California coastal park program. The Commission therefore finds that the denial of this project raises a substantial issue with respect to the grounds on which the appeal was filed.*

At that time, individual Commissioners expressed a desire for Parks to better engage the public

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<sup>1</sup> State Parks actually originally applied for 14 iron rangers. However, one of them was located at Campbell Cove in the Commission's retained permitting jurisdiction, and thus that was not a component of the project before the County at that time, and the project before the County was actually for 13 iron rangers.

<sup>2</sup> The Commission was evenly divided in its action, voting 6-6 on the substantial issue question. Because the motion was to find no substantial issue (which would have let the County's denial stand), and it did not pass, a substantial issue was found.

<sup>3</sup> In a de novo review context, Parks indicated that it would modify its project to use automatic pay parking machines (APPMs) as opposed to iron rangers, and that it would require a parking fee at their proposed fee lots of \$8 per day.

and the County regarding the proposal through a public participation process before the project was brought back to the Commission, and staff explained to the Commission that such a process could easily take a year or more. The Commission also identified key missing information that Parks would need to develop prior to any de novo hearing (including baseline data, expected use pattern changes and impacts accruing thereto, potential for use of fee revenues in Sonoma, etc.).

State Parks ultimately convened a working group<sup>4</sup> that met seven times between October 2015 and February 2016. Staff participated in four of the working group sessions, and it was clear that most members of the group did not support Parks' proposal for fees as a means to generate revenue. Parks did consider the group's input and modified their proposed project in mid-February 2016 to eliminate proposed fees at 5 of the originally proposed 13 parking areas,<sup>5</sup> and added proposed new fees at 3 new sites.<sup>6</sup> Parks' modified project also included manned kiosks for the first time, where these kiosks (as well as road improvements to allow 3 lanes of ingress/egress) would be installed near the entrances to the Goat Rock, Bodega Head, and Willow Creek facilities.

State Parks unveiled their modified proposed project at a February 17, 2016 public open house/workshop that attracted over 200 people. The goal of this open house/workshop was to collect public input but DPR was not prepared to take public testimony. DPR allowed stakeholder representatives to speak to the crowd, the public was allowed to submit comments at various issue tables, and DPR chose representatives of the public to speak at the close of the issue table portion of the open house/workshop.

Following the public session, on February 23, 2016 staff met in the field and toured the proposed fee sites with State Parks, and also met with the County in the field on February 24, 2016. In addition, staff held an informal public meeting and took input from the public at a well-attended public session held at the County Board of Supervisors chambers on the evening of February 24, 2016 where almost 100 people provided input, and staff answered their questions. From these series of meetings in late February, it became clear to staff that the proposed modified project engendered a series of issues that had not been fully addressed.<sup>7</sup> Staff was also concerned that

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<sup>4</sup> Consisting of Parks, Sonoma County, Sonoma County Surfrider Foundation, Coastwalk, Sonoma County Conservation Action, Bodega Bay Fire Department, and Stewards of the Coast and Ocean.

<sup>5</sup> DPR decided not to pursue fees for parking lots and pullout parking along Highway 1 at Russian Gulch, Portuguese Beach, Schoolhouse Beach, and both Salmon Beach parking areas.

<sup>6</sup> Although not part of the project denied by the County, Parks proposed new fee collection at their Willow Creek and Freezeout Creek facilities. Parks also proposed new fee collection in the Campbell Cove parking lot facility that was part of their proposed project to the County, but because it is located in the Commission's permitting jurisdiction was not actually part of that permit application nor denial.

<sup>7</sup> Including that the modified project now included: new components at locations never envisioned in the original project (e.g., Willow Creek and Freezeout Creek); development in the Commission's retained CDP jurisdiction and Parks had not submitted an application for this component; manned kiosks and related development that raised potential new coastal resource concerns that were only beginning to be fleshed out; and development requiring additional CEQA review. In addition, staff became aware of emerging issues associated with the proposal, including with respect to the way in which the fees would impact specific user groups, such as rock climbers at Goat Rock, and Native Americans who access these areas as sacred places, including to gather seaweed for ceremonies. In addition, the County indicated an interest in partnering with Parks on management issues (including in terms of providing for low income users), and recently eliminated fees at several County Parks because they found them to be inconsistent with the Coastal Act.

Parks had not yet provided any of the information requested by the Commission in its substantial issue hearing, and that the modified proposal triggered new information needs.

Staff met with both County and Parks staff together for the first time on February 29, 2016 and suggested that because the proposed modified project raised a series of issues and concerns, it would be in all parties' best interest to spend more time working together to see if those issues and concerns could be better addressed before heading to a new hearing. Of particular concern to staff was that the local engagement process had not been what staff and the Commission anticipated, and members of the stakeholders group and the public felt their concerns were not adequately addressed.

Ultimately, two main things came from Parks out of that February 29, 2016 meeting. First, they indicated that they did not want to delay the Commission hearing beyond the April hearing. Second, they decided to modify the project again to eliminate manned kiosks at Bodega Head, Goat Rock and Willow Creek parks and instead propose APPMs at all locations. In State Parks view, modifying the project to eliminate the kiosks would not require additional CEQA review, information and analysis identified by the public and by Commission staff which would avoid delays in moving the project forward. State Parks provided their proposed project materials, including the data they had developed to support it, in a submittal to staff on March 21, 2016 (see **Exhibit 8**). As indicated above, Parks now proposes to install APPMs (charging an \$8 fee per day, with hourly rates up to \$3 per hour), as well as signs, gates, parking lot improvements, trail repairs, bollards, and related development (including ADA improvements) at the eight referenced State Park parking areas.

The Sonoma County coast is one of the most spectacular coastlines in all of California. The coastline includes very high coastal bluffs, rocky and rugged back beach areas, and strong waves and currents that all combine for a dramatic coastal setting. Sandy beach areas themselves are both somewhat limited and difficult to access, other than through developed parking lots and access points. The coastline is also sparsely developed, with the exception of very scattered residential subdivisions and relatively larger population centers, such as at Bodega Bay and Jenner at the mouth of the Russian River. The dramatic coastline attracts visitors from far and wide, including a large proportion from inland Sonoma County itself. Because of the lack of transit options, and the sheer isolation of the coastline, visitors reach the beach access points at issue in this project primarily by car. They can experience scenic vistas of the dramatic coastline from Highway 1 itself, but access to the beaches and offshore areas generally require that these visitors park their cars in Parks' facilities to actually get to the beach and the water. In this way public access to the Sonoma County coast is different than other more accessible areas, such as in Southern California, including inasmuch as vehicular access is much more equated with access at all.

The areas where Parks proposes fees are very popular. According to Parks, Sonoma Coast and Salt Point State Parks receive some 3,275,000 visitors annually, essentially all of which arrive by car. These facilities are also highly used by visitors of limited income and means as suggested by data from Sonoma County. In their current form, these eight parking areas represent affordable recreational opportunity for the price of a tank of gas. Families currently travel from inland Sonoma to the coast for a day at the beach. It generally requires a 50-60 mile roundtrip for such a day at the beach from Santa Rosa or Petaluma. In other words, these facilities are essential for

continuing lower cost access to the coast at all for many economically disadvantaged groups, including the significant Latino population centers located near and within the City of Santa Rosa. In many ways, the question of whether to charge fees here can also be considered a question of social justice.

The Coastal Act requires that maximum access and recreational opportunities be provided. This Coastal Act direction to maximize access represents a different threshold than to simply provide or protect such access, and is fundamentally different from other like provisions in this respect. In other words, it is not enough to simply provide access to and along the coast, and not enough to simply protect such access, rather such access must also be maximized. This terminology distinguishes the Coastal Act in certain respects, and provides fundamental direction with respect to projects along the California coast that raise public access issues, like this one. In this case, the proposed project would not maximize access, rather it would reduce existing access opportunities, especially in terms of lower cost opportunities. In fact, given that sandy beach access in Sonoma is generally through these facilities due to the rugged nature of the coast, Parks proposal to require a fee to park essentially amounts to a proposal to prohibit sandy beach access at these facilities unless you can pay for it. In addition, one of the safer beaches is targeted in this way (Shell Beach), which could have the effect of displacing those who can't pay to more dangerous alternative beaches inappropriately. None of which maximizes public recreational access.

In addition, the Coastal Act doesn't allow for development to interfere with existing access, requires access to be provided, and doesn't identify fees as one the allowed reasons for limiting access. Again, in many ways the 'fee for parking' proposal is actually a 'fee for beach use' proposal given the nature of access to this particular stretch of coast. And the Coastal Act requires that lower cost facilities be protected as same. Beach and related public access to the Sonoma Coast essentially requires the beach and access consumer to also have a vehicle, and thus entry into this particular access system is already more costly than others (e.g., others where there are easy alternatives for access, where there are good transit and alternative transportation modes to get to the beach, etc.). Thus, access to and along the shore already costs users in this particular system, and keeping that cost as low as possible is key. The proposed fee program will serve to increase the cost of access, including beach access as described above, and in this case will fall disproportionately on those least able to afford it. None of this is consistent with Coastal Act requirements, and it does not protect lower cost public recreational access opportunities.

The Coastal Act's mandates to maximize public access and to protect lower cost recreational facilities, however, do not necessarily mean that public beach parking fees are always and necessarily inconsistent with the Coastal Act. In litigation regarding a prior effort by State Parks to establish beach parking fees, the court of appeal upheld the Commission's approval of fee collection devices and fees because in that instance State Parks had submitted adequate evidence that imposition of the fees would not significantly affect attendance and that State Parks had established adequate programs to minimize adverse effects on lower-income populations. As explained in greater detail below, DPR has not submitted adequate information regarding how the currently proposed project would affect attendance, how and to what degree it would lead to offsite impacts, or how Parks would minimize adverse impacts on lower-income visitors nor has

State Parks proposed a program to provide lower cost access for low income persons to these beach parks.

In terms of the Sonoma County LCP, the County's LCP adopted in 2001 contains an Access Plan that provides specific descriptions of facilities and policies (called "recommendations" in the Plan) regarding the use of those facilities. The LCP does not explicitly address whether fees may be established at public parking facilities in the County, but it does address anticipated changes to facilities at those locations. And those LCP identified changes do not identify the installation of fee-collection devices or fee programs. The LCP contains references to all of the sites originally proposed by DPR to the County in 2012.<sup>8</sup> The County's LCP calls for 'no change' in the Stump Cove access area, 'no change' in the Goat Rock area, and for Shell Beach, 'no change' in vertical access but a recommendation to develop a trail connector and staircase as appropriate between Shell Beach and Wright's Beach. With respect to Bodega Head, there are no specific references in the LCP to 'no change', but the LCP indicates that it was not one of the then fee-charged Sonoma County locations, and that all of the existing fee locations pre-dated the Coastal Act and/or the LCP.

It can reasonably be presumed that users that can't or won't pay a fee to park will try to find offsite parking opportunities. Again, these opportunities along this rugged shoreline are few and far between, and Highway 1 is fairly narrow with limited shoulders along most of this coastline. Users displaced in this way can be expected to lead to creation and increased use of 'volunteer' trails (that could lead to resource and ESHA impacts) and increased pedestrian use along the Highway which can be dangerous. This will also lead to visual impacts from more cars alongside the Highway. Although the Commission and staff asked Parks to identify the nature of these impacts due to such changes in use patterns, and asked Parks to coordinate with the Caltrans, the County Sheriff, and the California Highway Patrol to understand their input with respect to such increased use of Highway 1, Parks has not yet provided any detail on these points, and thus these impacts cannot be quantified at this time with certainty. That said, it is clear to staff that there will be more of such Highway 1 shoulder use, and there is no doubt that it will lead to lesser public access utility and more coastal resource impacts than is currently the case. Again, such impacts only serve to further negatively impact public access and coastal resources.

In short, the project as proposed is inconsistent with the Coastal Act and the LCP. The project does not include adequate measures to address impacts on access and recreational opportunities, particularly for lower income populations, or to address potential spillover effects that establishing fees at currently free parking lots is likely to cause. As indicated above, the program not only reduces (as opposed to maximizing) coastal public access parking, it also equates in some ways to a prohibition on beach access at these locations unless you can pay a fee which disproportionately impacts persons of low income. Staff therefore recommends that the Commission deny the application at this time.

At the same time, State Parks is an important and valuable partner with the Coastal Commission and plays a fundamental role in the provision of public coastal access and recreation

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<sup>8</sup> In some instances the LCP includes specific references to sites, and in others reference is made to the County's "Recreation Plan" which consists of a series of policies and maps.

opportunities both to the people of and visitors to the State. State Parks manages some one-quarter of the State's coastline and roughly half of the Sonoma County coast. In 1980, 91 percent of State Parks' budget came from the State General Fund, and in 2013, contributions from the General Fund accounted for 29 percent of the budget.<sup>9</sup> State Parks is therefore increasingly reliant upon other methods of revenue generation to fund its system statewide, including at coastal State parks. State Parks has received specific legislative and administrative direction in recent years to create new revenue streams to fund its operations and the management of its facilities.

At present, State Parks funds day-to-day operations at State Park units on the Sonoma County coast primarily through budget allocations from the State General Fund and income from the State Parks and Recreation Fund (SPRF). In FY 2012/13, State Parks' Russian River District (now called the Sonoma-Mendocino Coast District), which includes its Sonoma County coastal park units, generated \$1.29 million in revenue through fees, concessions, or other miscellaneous revenue sources. With a budget of \$4.5 million, the District generated roughly one-fifth its operating cost in revenue. Only three of the State's 20 State Parks districts generated revenue greater than their "homebase" expenditures (i.e., day-to-day operations including personnel, operating expenses, and equipment) in FY 2012/13.<sup>10</sup> The remaining 17 districts, including the Russian River District, generated less revenue than spent in homebase expenditures, with the remainder of the homebase expenditures paid primarily through monies derived from the General Fund or the SPRF.<sup>11</sup>

Parks has indicated that the project is needed to increase revenues to allow for better maintenance and upkeep and resource protection at these parks. Staff does not disagree that better funding for State Parks is needed, but the degree to which these fees will be plowed back into these parks is unclear. Parks indicates that State law prevents them from agreeing to put 100% of the revenues back to Sonoma County parks, and that they cannot commit to specific improvements at these Park units.

Staff believes that the best path forward for fee parking programs at the State beaches on the Sonoma Coast is to provide the necessary information and analysis to address the potential impacts associated with a fee parking program which will inform how to avoid or mitigate any identified adverse impacts. In addition, DPR should propose specific measures or programs to provide lower cost access to these beach parks for low income persons. Furthermore, DPR should explore a collaborative partnership with Sonoma County and non-profit entities for joint operation of some of the beach parks as Bodega Head or Willow Creek to share the costs for operation and maintenance which could result in reduced or no fees. Parking fees to access State beaches is an issue of statewide importance, and it is better understood within a statewide context, wherein fees may make sense at certain locations and units, but maybe not others, and local interests and partners are better factored into the equation, including in terms of potential shared management and parks development. A statewide perspective also helps to ensure that

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<sup>9</sup> Testimony of Mat Fuzie, State Parks Deputy Director of Operations, to the Sonoma County Board of Supervisors, June 18, 2013.

<sup>10</sup> The Orange Coast, San Diego, and Channel Coast districts in Southern California.

<sup>11</sup> FTI Consulting, November 30, 2013.

such a statewide program is equitable, includes transit alternatives in locations where fees are newly imposed, and allows DPR to further explore partnerships with interested local governments and nonprofits who wish to relieve DPR of its burden of maintaining facilities. This process would be consistent with the letter agreements exchanged in 2013 by the then executive directors of the Commission and State Parks, and with the direction given in Parks Forward, the internal reorganizing effort underway within DPR. For these reasons, staff recommends that the Commission deny the revised proposal submitted by DPR. The motion and resolution can be found on page 10 of the staff report.

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### APPENDICES

Appendix A – Substantive File Documents

### EXHIBITS

<b>Exhibit 1.</b>	Project Location Map
<b>Exhibit 2.</b>	Expired CDPs for Fee Collection at Sonoma County Beaches
<b>Exhibit 3.</b>	Sonoma Coast State Park Map
<b>Exhibit 4.</b>	Sonoma County Notice of Final CDP Action
<b>Exhibit 5.</b>	March 26, 2015 Memorandum from State Parks to the Coastal Commission
<b>Exhibit 6.</b>	October 27, 2015 Informational Needs Letter from CCC Staff
<b>Exhibit 7.</b>	March 4, 2016 CCC Staff List of Concerns
<b>Exhibit 8.</b>	March 21, 2016 DPR Project Submittal
<b>Exhibit 9.</b>	Relevant Coastal Act and LCP Policies
<b>Exhibit 10.</b>	Salt Point State Park Map
<b>Exhibit 11.</b>	Public Correspondence
<b>Exhibit 12.</b>	Timeline of Communications

## I. MOTION AND RESOLUTION

Staff recommends a **NO** vote on the following motion. Failure of this motion will result in denial of the CDP and adoption of the following resolution and findings. The motion passes only by an affirmative vote of the majority of the Commissioners present.

***Motion:** I move that the Commission approve Coastal Development Permit Application Number A-2-SON-13-0219 pursuant to the staff recommendation. I recommend a no vote.*

***Resolution to Deny a CDP:** The Commission hereby denies Coastal Development Permit Application Number A-2-SON-13-0219 and adopts the findings set forth below on grounds that the development does not conform with the policies of the Sonoma County certified Local Coastal Program and/or with the public access policies of Chapter 3 of the Coastal Act.*

## II. FINDINGS AND DECLARATIONS

### A. PROJECT LOCATION

The Department of Parks and Recreation's proposed project, as proposed in a submittal received on March 21, 2016, now includes eight different proposed fee locations in two State Parks spread along Highway 1 in Sonoma County. Sonoma Coast State Park is a long, linear coastal park that includes many different pocket beach areas and that extends north on Highway 1 some 19 miles from Bodega Head in the south to Vista Point, approximately 4 miles north of Jenner, in the central portion of Sonoma County's coastal zone. Salt Point State Park is a 6,000-acre State Park located in the generally more rugged north-central portion of Sonoma County's coastal zone covering some 16 miles of coast. all told, the proposed project is located along approximately 35 miles of Sonoma County coastline (**Exhibit 1**).

The proposed development would be located at Stump Beach in Salt Point State Park (APN 109-030-006), and at Goat Rock – Blind Beach (APN 099-040-004), Goat Rock – South Lot (APN 099-040-004), Goat Rock – North Lot (APN 099-040-002), Goat Rock – Arched Rock (APN 099-050-006), Shell Beach (APN 099-060-001), Bodega Head – West Lot (APN 100-010-007) and Bodega Head – East Lot (APN 100-010-007) in Sonoma Coast State Park.

Roughly half of the Sonoma County coastline is located within public parkland, including much of the land west of Highway 1, approximately 35 miles of which is State parkland, and another 3 miles of which is County parkland.<sup>12</sup> Sonoma Coast State Park and Salt Point State Park are used for a variety of recreational purposes, including passive viewing of the coastline and beaches, birdwatching, hiking, picnicking, surfing, and camping. Fort Ross State Historic Park, which is located on both sides of Highway 1 roughly halfway between Sonoma Coast and Salt Point State Parks, includes an historic Russian colony and museum.

With the exception of very scattered residential subdivisions and larger population centers, such as Bodega Bay and Jenner, the Sonoma County coastline is sparsely developed. The southern coast is more populated than the northern coast. The coastline is for the most part characterized

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<sup>12</sup> Sonoma County LCP, Recreational Facilities Overview, V-34/p.90.

by its rocky shoreline and high bluffs, though there are numerous State and County beaches accessible to the public. There is very limited bus service available on the coast, and thus visitors reach the beach access points at issue in this appeal primarily by car.

## **B. PROJECT DESCRIPTION**

DPR proposes to install automatic pay parking machines (APPMs), sign posts and signs in order to charge a fee at the proposed locations. The proposed project also includes additional related development as well, including gates, ADA improvements and trail repairs. DPR's submittal includes the following proposed development at each of the eight locations:

1. **At Bodega Head East:** Install a new gate (4 ft. high, 12 ft. long) to span the roadway with excavation of holes on either side of the road (1 ft. in diameter, 3 ft. deep), new bollards, and install a new APPM fee collection station, create new concrete walkway to fee collection station and restrooms (5 ft. wide and 80 ft. long), remove storage materials, base rock and repave the parking lot for an estimated 99 regular spaces, replace existing ADA space with 2 concrete ADA spaces, remove remaining asphalt and base rock and repave the road that leads to the proposed new gated parking lot.<sup>13</sup>
2. **At Bodega Head West:** Perform maintenance to beach access trail as needed, remove existing pole barriers and bollards, and replace with large boulders, add additional base rock and regrade parking lot for an estimated 89 regular spaces and improve parking drainage, replacement of existing 2 ADA parking spaces with 3 concrete surfaced ADA parking spaces, install new bollards, relocate a wood barrier, and install a new APPM fee station and a new walkway to the fee station.
3. **At Shell Beach:** Restripe the parking lot for 36 regular and 2 ADA spaces, install 5 new bollards, and a new APPM fee collection station, create a new trail connection to the Kortum Trail from the parking lot on the southern side (5 ft. wide and 40 ft. long), create a new concrete walkway to the restrooms and the beach access trail (5 ft. wide and 124 ft. long) and repair the beach access trail as needed.
4. **At Blind Beach (Goat Rock):** Install a new road gate to span the roadway to the parking lot (4 ft. high and 12 ft. long), restripe parking lot for 17 regular and 2 ADA parking spaces, install a new APPM fee station and 5 new bollards, repair Blind Beach access trail, and create a trail connection between existing Kortum trail and the restrooms (5 ft. wide and 40 ft. long).
5. **At Goat Rock South:** Restripe the parking lot for 107 regular parking spaces and five ADA spaces, install a new concrete walkway (5ft. wide, 40 ft. long), a new APPM fee collection station, and new bollards, and perform trail improvements to include ADA compliance on the trail leading from parking lot to beach area.

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<sup>13</sup> Bodega Head East has been closed by DPR from being used by the public for some time without benefit of a CDP. It is presumed that DPR would reopen Bodega Head East to parking on a daily basis and restore access.

6. **At Goat Rock North:** Install a new APPM fee collection station and 5 new bollards, remove an existing island feature in drive aisle, backfill it with asphalt and an aggregate base, restripe the parking lot to create 62 regular spaces and 3 ADA spaces, create a turnaround and a passenger loading zone at the north end of the lot, and construct a concrete accessible sidewalk to connect the existing sidewalk to the restroom and fee collection station (5 ft. wide and 40 ft. long).
7. **At Arched Rock (Goat Rock):** Restripe the parking lot for 24 regular and 2 ADA parking spaces, and install a new APPM fee collection station and 5 new bollards.
8. **Stump Beach:** Create a new concrete pad area for 2 ADA parking stalls and for a new APPM fee collection station, install new APPM fee collection station, five new bollards, create a new concrete path to fee station, remove an old pit restroom and install a new restroom, add an aggregate base to lot and regrade the parking lot for 35 regular spaces.

According to DPR staff, the proposed new gates on the road to Bodega Head East and at the Blind Beach parking area (Goat Rock), and the two existing gates, one near the day-use area entrance at Stump Beach and one near Highway 1 on Goat Rock Road at Goat Rock, would be closed when the parks are closed, which DPR indicates is during night-time hours (sunset to sunrise).

### C. PROJECT HISTORY

This would be the first time fees would be charged to access these 8 locations. However, this is not the first time DPR has proposed fees at Sonoma County beaches.

#### 1992 Parking Fee CDPs

In 1992, as part of a statewide request by DPR, the Commission approved three CDP applications to install fee collection devices (“Iron Rangers”) in the Russian Gulch, Goat Rock and Campbell Cove portions of the Sonoma State Parks (CDPs XS-91-12 – Russian Gulch; XS-91-13 – Goat Rock; and XS-91-14 – Campbell Cove). The Commission first denied DPR’s statewide request and then approved the statewide proposal in different phases. Due to additional time needed by the County to review that proposal, there was a separate agreement between Sonoma County and DPR for reimbursement of revenue during the review time and the possibility of agreements concerning revenue in the future.

The Commission noted in its findings: “The Department [DPR] will implement a monitoring program and will submit three annual reports to the Commission. These reports will identify and propose mitigation for any adverse impacts to natural resources and neighboring communities from the imposition of new fees.” The Commission did not suggest, therefore, that implementation of fee parking could not have an impact on coastal resources, and expected DPR to submit regular reports demonstrating that no adverse impacts had occurred, or if any did occur that DPR would propose mitigation for those impacts.

The Commission was sued by the Surfrider Foundation over its 1992 CDP decisions. The City of Fort Bragg intervened on behalf of Surfrider. The Commission won that case in Superior Court and Surfrider and the City of Fort Bragg appealed that decision to the 1st District Court of

Appeal. In 1994, the Court of Appeal upheld the Commission's CDP actions in 1992 approving the installation of fee collection devices at 16 State Park beach parking lots statewide, including the three locations cited above in Sonoma County. The Court held that the establishment of the fees and the installation of fee collection devices were exempt from CEQA. The Court also upheld the Commission's findings that approval of the fee collection devices was consistent with the Coastal Act's public access and recreation policies because State Parks had submitted evidence both that prior fee increases at other parks had not significantly affected attendance and that State Parks had adequate programs in place to address impacts on lower-income users.<sup>14</sup> Similar to the Commission, however, the Court did not suggest that adverse impacts to public access could not occur from the approved project. The Court found that the Commission had thoroughly analyzed the proposed project and its impacts and that the Commission's findings supported its conclusion at the time that the proposal was consistent with the public access and recreation policies of the Coastal Act:

*...The findings acknowledged the claimed potential for creation of alternative access routes, cited the statistical evidence of minimal impact on attendance resulting from prior parking fee increases, described the Department's measures for providing low-cost annual parking passes to disadvantaged and frequent users, and noted the Department's intent to implement a program to monitor any adverse environmental impacts, before concluding with the findings of consistency. The findings do not ignore the access issue, but addressed it in considerable detail. In that respect they were more than adequate.*

Despite the Court of Appeal decision and the negotiated agreement with Sonoma County, DPR did not exercise the approved CDPs for the Sonoma County locations, and these CDPs expired (**Exhibit 2**).

### **2012 DPR CDP Application to Sonoma County**

On May 31, 2012, again as part of a statewide effort,<sup>15</sup> DPR submitted a CDP application to Sonoma County to install fifteen self-pay devices ("iron rangers"), up to fifteen sign posts and signage in Sonoma Coast and Salt Point State Parks. DPR proposed to install iron rangers at parking facilities at Stump Beach in Salt Point State Park, and at parking facilities at Russian Gulch, Goat Rock, Shell Beach, Portuguese Beach, Schoolhouse Beach, Salmon Creek North,

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<sup>14</sup> (*Surfrider Foundation v. Cal. Coastal Comm.*, (1994) 26 Cal.App.4<sup>th</sup> 151, 158.)

<sup>15</sup> For example, on March 12, 2012, DPR also applied for a CDP (CDP 5-12) with the City of Fort Bragg to perform development improvements in an existing parking lot as well as to install a self-pay station and signage. On June 13, 2012, the City of Fort Bragg approved the proposed parking lot development improvements but denied the request for a self-pay station, finding that DPR had failed to consult with the City during the Notice of Exemption period, effectively denying the City the right to comment on the claimed CEQA exemptions, that the self-pay station would have a significant effect on the environment particularly with respect to adjacent free parking facilities and public safety issues resulting from increased usage of nearby informal areas by visitors wishing to avoid the payment of fees. DPR did not appeal this denial to the Commission.

In 2012-13, DPR also submitted several CDP applications to the Commission itself for self-pay stations in Southern California. In these cases, the Commission conditionally approved five-year CDPs for the self-pay stations.

Bean Avenue, Bodega Head and Bodega Dunes in Sonoma Coast State Park (**Exhibit 3**). The County did not have jurisdiction to act on a request at Campbell Cove because the location for installation is located within the Commission's retained CDP jurisdiction. Because it turned out that Bodega Dunes facility already had a fee collection device, and because Campbell Cove is located in the Commission's CDP jurisdiction, the application was actually for 13 iron rangers.

On January 17, 2013 the Sonoma County Board of Zoning Adjustment denied a CDP for DPR's proposed Iron Rangers project. In its denial action, the County noted that DPR's permit application did not include a request to collect fees:

*State Parks regards the decision about whether to collect fees as an "administrative decision" that is not subject to a Coastal Permit. State Parks has not applied to charge a particular fee, and no fee amount is specified in the application, but they are applying to install the signs that inform visitors that a fee is due and to install the iron boxes into which the fees would be paid and later collected by parks staff.*

The County found the change from free parking to fee parking to be a change in the "type of public use," and determined that such a change constituted "development" requiring a CDP from the County. Thus the County found, even though DPR did not provide a fee collection system as part of their County CDP application, that the installation of fee-collecting devices is the means to charge a fee and charging fees changes the type of public use currently occurring along the Sonoma Coast, and is therefore development requiring a CDP which raised public access policy concerns.

In denying the proposed project, the County cited both its certified LCP and Chapter 3 of the Coastal Act. The County found that Coastal Act Section 30210 requires "maximum" access and places only four limitations on its provision: public safety, protection of public rights, protection of private property rights, and protection of natural resource areas. The County specifically noted that Coastal Act Section 30210 does not include fiscal or budgetary constraints as a basis for limiting "maximum" access. The County also cited Coastal Act Section 30212.5, calling for distribution of parking areas throughout an area so as to mitigate against impacts to access, social and otherwise, of overcrowding or overuse by the public of any single area. The County further cited Coastal Act Section 30213 which states that lower cost visitor and recreational facilities shall be protected, encouraged, and where feasible, provided. The County's decision finally cited Coastal Act Section 30214, speaking to the legislative intent of the public access policies.

The County decision noted that DPR's proposal to charge fees primarily impacted motorists. The County noted that only 3 of the affected parking areas (Portuguese, Schoolhouse and Bean Avenue) were located near residential areas where local residents could walk to the beach in lieu of driving. The County's findings also state that most Sonoma County residents (and obviously visitors to the area) must drive to the beach because there is no viable public transit service available along the coast.<sup>16</sup> Unlike more urban settings where bus transit is a viable access

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<sup>16</sup> The Sonoma County Transit system only operates bus service to the coast on weekends in July-August with limited service along the coast. Mendocino transit has one route serving the coast, departing from Mendocino County in the morning to take riders to Santa Rosa by way of Bodega Bay, and then making a late afternoon return trip to Mendocino County.

alternative, current available transit is not a viable option for inland residents of Sonoma County and/or other coastal visitors. The County found that a fee to park would be a fee on top of the cost to drive back and forth to the beach, and thus found the project to be inconsistent with the public access policies of the Coastal Act. The County also noted concern with Coastal Act Section 30240 which requires the protection of environmentally sensitive habitat areas (ESHAs), and that development adjacent to ESHA and parks be sited and designed to prevent impacts which would significantly degrade ESHA and parks, and indicated that the likelihood of environmental damage occurring was heightened by the fee proposal. The County reasoned that beach visitors unwilling or unable to pay to park in the beach parking lots would park elsewhere along the highway and create “volunteer” trails to the beach in areas with fragile environmentally sensitive habitat.

The County also found that the proposal did not conform to its certified LCP. The County found that the LCP’s Access and Recreation Plan states that “no change” (e.g., from free to fee) is allowed to occur at Stump Beach, the four Goat Rock parking lots, Shell Beach or Portuguese Beach, and therefore that State Parks’ proposal to charge fees at these locations was in direct conflict with the Access and Recreation Plan provisions of the LCP.

The Board of Zoning Adjustments’ denial decision was appealed by DPR to the Sonoma County Board of Supervisors. After deliberation, the Board of Supervisors unanimously upheld the denial decision and denied State Parks’ appeal on June 19, 2013. The Board’s findings for denial included detailing the above inconsistencies with the Coastal Act (Sections 30210, 30212, 30213, 30214 and 30240) and the LCP. The Board noted that its findings and determinations set forth in its resolution of denial are based upon the record of the permit proceedings before the County. The County’s Notice of Final CDP Action is provided in **Exhibit 4**.

#### **Appeal to the Coastal Commission**

On July 8, 2013, within the 10-working-day appeal period, DPR filed an appeal with the Commission of the County’s denial. During the remainder of 2013, the Commission received limited contact from DPR staff regarding the appealed project. In February 2014, North Central Coast Commission staff re-initiated contact with DPR staff regarding the pending appeal and requested information related to the appeal contentions (please see **Exhibit 12** for a timeline of communications between DPR and CCC staff), including:

- A map showing the distribution and combination of existing free and proposed new fee areas with access to the shoreline.
- Alternative parking options and/or free parking options, including non-ticketed roadside pullouts.
- Existing alternative access routes to the shoreline or proposed alternative access routes from alternative parking locations.
- Statistical evidence to support DPR’s claim that minimal impacts on attendance have resulted from prior parking fees being imposed or increased.
- Proposed monitoring programs to document any adverse environmental impacts.

- Information related to Bodega Dunes being included in the original CDP application to the County.

DPR staff sent an existing map of the two Coastal Parks showing the distribution of parking but absent labels or specifying information as to whether the parking location was contained in a formalized lot, was a roadside pullout and/or how many spaces were available at each location noted. In early March 2014, DPR staff indicated with respect to the other informational requests of Commission staff, DPR would contact the Commission once they had information to share.

In May and June of 2014, Commission staff toured Sonoma County beaches on two separate occasions, once with County parks and planning staff and once with local DPR staff.

On March 26, 2015, just before Commission staff was to finalize its proposed staff recommendation on substantial issue (mailing was required by April 3, 2015), DPR submitted a lengthy memorandum to the Commission in order to provide additional information on its proposed project (**Exhibit 5**). Appellants often provide the Commission with additional factual information to support their original appeal contentions ahead of the item's hearing, and factual information of this nature provided by DPR in this memorandum was used by Commission staff for determining substantial issue. However, DPR's March 26th memorandum also described important aspects of the proposed project differently than they were described in DPR's application to the County. The most significant difference is in the description of the self-pay devices themselves, and the fee program that would be applied. In DPR's original application to Sonoma County, the devices are described as "self-pay devices (i.e., iron rangers)" and "metal cylinders." The March 26, 2015 memorandum included a project description indicating the use of electronic self-pay stations or Automated Pay Parking Machines (APPM) rather than iron rangers, and a fee program (**Exhibit 5**, pp. 1-2):

*In the short time since CSP filed its original application, the available technology now employed has rapidly evolved and improved. Whereas the traditional fee collection stations were limited to a heavy metal cylinder planted in the ground, CSP installs electronic self-pay stations or Automated Pay Parking Machines (APPM) at many of its busier parks, even in remote areas with limited infrastructure. APPMs are solar powered units which have Wi-Fi connectivity to allow for the purchase of day use access through the use of cash, debit, credit and Pay Pass options. They are fully programmable, and can be modified to meet daily needs, allow for retrieval of data, and thus have the potential for a more flexible and efficient rate schedule. Users can add time using their smart phones in locations where cell phone service is available, and CSP can alternate rate schedules to ensure maximum access is promoted.*

DPR's March 26th memorandum also proposed, for the first time, an initial fee schedule, which would be identical at each of the 13 locations. Visitors would have the option of a flat all-day rate of \$8, which would also allow them to park at all similar day use areas located within the Sonoma-Mendocino Coast District, an hourly rate of "up to \$3," or they could park for free for 15 minutes. The memorandum explained that DPR's ability to provide both flat and hourly options is made possible by the use of the APPMs. The APPMs could also allow for data

collection that would be used as part of a monitoring and mitigation program to ensure that no reduction in public access would result from the collection of new fees at these parking lots.

In sum, the project as described in the March 26, 2015 memorandum had critical elements that were not fully described by DPR when Sonoma County processed and acted upon their coastal permit application. Principally, the differences were: 1) the use of APPMs rather than iron rangers; 2) the identification of a fee collection program, which includes flat and hourly rates, made possible by the use of APPMs; and 3) a monitoring program to ensure no reduction in public access (which would employ data collection made possible by the use of APPMs).

On April 15, 2015, the Commission held the substantial issue phase of the hearing on the DPR appeal in Marin County. The Commission staff recommendation acknowledged that Sonoma County had valid reasons under the Coastal Act and the certified Sonoma County LCP to deny the proposed project. At the same time, staff indicated it was clear that the County denial could impact DPR's ability to increase revenue generation as required by recent legislative and administrative mandates, and thus the County denial had implications on DPR's ability to fund operations at State coastal parks not just in Sonoma County but in coastal State parks statewide. Despite the validity of the County's concerns, the County's denial of DPR's proposal raised a series of statewide issues and there was an argument that the Commission should take jurisdiction and hold a de novo hearing on the merits of the project. Therefore, Commission staff recommended that a substantial issue existed. However, because of the lack of information regarding baseline conditions and expected impacts, Commission staff recommended that the Commission continue the de novo phase of the hearing until a future date:

*If the Commission decides to vote for a "Substantial Issue" finding in order to do that, then the de novo hearing portion of the appeal would be continued to a future date and time to be determined. Critically, such a Substantial Issue finding would require DPR to substantially augment the information on baseline conditions and expected impacts associated with the project, in order for there to be sufficient information to allow the Commission to appropriately make a decision on the application, whether that decision were to be approval with some form of conditions, or potentially a denial if the Commission cannot find that the proposal is consistent with the Coastal Act and LCP.*

After public testimony, the Commission found that the appeal raised a substantial issue,<sup>17</sup> thus taking jurisdiction over the CDP application. The Commission listed a number of information needs that DPR would need to provide to the Commission before a de novo hearing could be considered, stating in its findings the following information that would be necessary to consider DPR's proposed project:

- *Data on existing usage of these parking lots and pullout areas (including those with proposed fees, and those free areas that visitors who require or desire to avoid the fees might utilize). State Parks' March 26th memorandum indicates that some of this information may already be available, and the Commission's understanding is that*

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<sup>17</sup> The Commission was evenly divided in its action, voting 6-6 on the substantial issue question. Because the motion was to find no substantial issue (which would have let the County's denial stand), and it did not pass, a substantial issue was found.

*additional monitoring might be required of State Parks prior to actual collection of fees in order to establish baseline user data.*

- *Evaluation of expected changes in usage of these parking lots and pullout areas if fees are instituted as proposed, and mitigations to address any potential reductions in access that might be engendered by the fees.*
- *To the extent possible given the provisions of State law, the proposed program for use of the additional anticipated additional revenue generated within the Sonoma-Mendocino Coast District as a result of the proposed fee collection, including how and where the revenues would be applied, including what percentage of collected fees would be spent within areas where collected and within Sonoma County coastal parks in general.*
- *To the extent possible, additional information regarding facility and amenity improvement proposed both short-term and long-term for Sonoma County coastal parks.*

At that time, individual Commissioners also expressed a desire for State Parks to better engage the public and the County regarding the proposal through a public participation process before the project was brought back to the Commission, and staff explained to the Commission that such a process could easily take a year or more. The Commission then asked DPR to work with Commission staff, the members of the public and public stakeholder groups to resolve issues of concern before coming back to the Commission. Commission staff was also directed to work both with DPR and the County as well as the public to ensure maximum public participation in the decision making process.

### **Post Substantial Issue Hearing**

In May of 2015, Commission and DPR staff began discussing when the de novo hearing would be held and the remaining informational needs. Commission staff indicated that baseline conditions at the proposed sites should be monitored at least during the summer of 2015 so that the peak summer month usage and possible impacts to use could be assessed prior to the de novo hearing by the Commission. DPR also expressed an interest in taking the lead in facilitating local involvement, including working with the County and stakeholders. DPR indicated they would invite Commission staff to attend as well. Commission staff responded that all three parties - DPR, the Commission and the County - should meet to craft and agree upon a plan for providing for a local process where the public can provide input on DPR's proposal and help shape the proposed project. Ultimately, and for a variety of reasons, not the least of which was the unexpected and tragic death of DPR's District Superintendent, Liz Burko, in August of 2015, that three-way meeting to discuss the public participation process did not occur, and DPR embarked on its own public engagement strategy. DPR also started in on some data collection, including installing 4 traffic counters in some of the parking lots (at Bodega Head, Goat Rock, North Salmon and Stump Beach) in the project area.<sup>18</sup>

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<sup>18</sup> The traffic counters are traditional strips that are driven over, and the counters capture the date and time. This data can demonstrate vehicle entry and exit times and days, but the data has limitations. For example, the traffic counters do not determine how long people stay, rather they can only identify the number of cars that drove over the strip either coming in or out of the parking area.

There did not appear to be any effort by DPR to monitor usage by the public of other existing free use areas, roadside pull-out areas or any effort by DPR to assess these areas for possible impacts.

On October 27, 2015, after being requested to do so by DPR staff, Commission staff sent a detailed letter of informational needs still outstanding, and deadlines for making production for a April 2016 Commission meeting (**Exhibit 6**).

Commission staff attempted to set up several three-way meetings between the County, DPR, and Commission staff, including to discuss the public process for getting input and ideas from the public, as well as to discuss the project, data needs and the process for getting to a decision. Ultimately three-way meetings in early January were scheduled, but were cancelled by DPR. At that time, DPR indicated that it would prefer to meet separately with Commission staff. Consequently, Commission staff did not meet jointly with DPR and the County to plan the public participation process. Rather, DPR planned the public participation process themselves. Commission staff attended public stakeholder meetings conducted by DPR in October, November and December 2015, and in February 2016. At the last public stakeholder meeting conducted on February 3, 2016, DPR presented a modified project that eliminated proposed fees at 5 of the originally proposed 13 parking areas,<sup>19</sup> and added new fees at 3 new sites.<sup>20</sup> DPR's modified project also included manned kiosks for the first time, where these kiosks (as well as road improvements to allow 3 lanes of ingress/egress) would be installed near the entrances to the Goat Rock, Bodega Head, and Willow Creek facilities. The modified project presented by DPR in mid-February also included APPMs at all of the other sites that were part of the original fee proposal.<sup>21</sup> On February 17, 2016 DPR conducted a public open house/workshop and presented their proposed modified project to the public, which was similar to the one presented to the stakeholder group on February 3, 2016.

DPR described the new proposal as an effort to balance the input from the public, the Coastal Act and the challenges of managing and protecting the natural and cultural resources of the State Park System. It called for a flexible fee schedule with hourly rates of up to \$3 per hour where possible, and an \$8/day fee for all new parking fee areas which, once paid, would be good for day use in all State Parks in the Sonoma District on date of purchase. DPR also proposed to develop a Sonoma Coast State Parks Pass for access to Sonoma County coastal park units, to make known the availability of a DPR Low Income Pass, to provide for free "surf checks" for up to 30 minutes, to minimize service reductions where fees were not proposed, to put back revenue into improving services to Sonoma Coast, and to implement a Sonoma Coast Advisory Group to build and maintain community involvement.

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<sup>19</sup> Proposed fees were eliminated at parking lots and pullout parking along Highway 1 at Russian Gulch, Portuguese Beach, Schoolhouse Beach, and both Salmon Beach parking areas.

<sup>20</sup> Although not part of the project denied by the County, DPR proposed new fee collection at their Willow Creek and Freezeout Creek facilities. Parks also proposed new fee collection in the Campbell Cove parking lot facility that was part of their proposed project to the County, but because it is located in the Commission's permitting jurisdiction was not actually part of that permit application or denial.

<sup>21</sup> At the Shell Beach, Stump Beach and Freezeout Creek parking facilities.

At the public meeting, DPR described the project as revised, invited stakeholder group representatives to make a statement, and then invited the attending public to visit various issue tables, view maps and discuss issues of concern with DPR staff. At the conclusion of tabling, the matter was brought back to the general group and attendees made it clear they wished to speak. DPR allowed a limited number of public representatives who had not spoken before to speak, but did not allow for general public comment, stating that they lacked the ability to take public comment or to record public comment and that they already had the input given by the public at each of the visited issue tables.

On February 22, 2016 Commission staff toured the proposed sites in the revised proposal with DPR, and on February 23, 2016 Commission staff also toured portions of the Sonoma coast with the County. That evening, Commission staff conducted office hours and met with interested members of the public for approximately 3 hours. Approximately 100 members of the public came to speak with Commission staff. It was clear at the conclusion of that public session that the attendees did not support the revised project and more importantly did not support the imposition of fees on Sonoma County beaches. From these series of meetings in late February, it also became clear to staff that the proposed modified project engendered a series of issues that had not been fully addressed.<sup>22</sup> Staff was also concerned that DPR had not yet provided any of the information requested by the Commission in its substantial issue hearing, and that the recent project changes triggered new information needs.

On February 29, 2016 the Commission, DPR and the County finally met jointly for the first time since DPR appealed this project in 2013. DPR presented their current proposal, there was a discussion of the issues, and Commission staff identified logistical issues that needed to be resolved prior to going to a hearing. Commission staff asked DPR for the submittal of their modified proposed project, since DPR had not yet submitted the revised project introduced on February 17, 2016. Commission staff also raised CEQA concerns since DPR had indicated at the February 17, 2016 public open house/workshop that they would start a CEQA process on the revised project, and Commission staff was concerned that that process would not conclude in time for preparation of the Commission staff report. Finally, Commission staff asked again about their baseline informational needs being responded to by DPR since DPR had not yet submitted any of the information identified in the substantial issue findings or in the Commission staff letter of October 27, 2015 (**Exhibit 6**). Commission staff agreed to send DPR an updated list of informational needs, and did so on March 4, 2016 (**Exhibit 7**). The Commission's list included all of the items previously identified, as well as those new items emanating from the project revisions introduced on February 17, 2016 and from the February 29, 2016 meeting.

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<sup>22</sup> Including that the modified project now included: new components at locations never envisioned in the original project (e.g., Willow Creek and Freezeout Creek); development in the Commission's retained CDP jurisdiction and Parks had not submitted an application for this component; manned kiosks and related development that raised potential new coastal resource concerns that were only beginning to be fleshed out; and development requiring additional CEQA review. In addition, staff became aware of emerging issues associated with the proposal, including with respect to the way in which the fees would impact specific user groups, such as rock climbers at Goat Rock, and Native Americans who access these areas as sacred places, including to gather seaweed for ceremonies. In addition, the County indicated an interest in partnering with DPR on management issues (including in terms of providing for low income users), and recently eliminated fees at several County Parks because they found them to be inconsistent with the Coastal Act.

Commission staff indicated that it would be in all parties' best interest to spend more time working together to see if the issues and concerns being raised could be better addressed before heading to a new hearing.

Ultimately, two main things came from DPR out of that February 29th meeting. First they indicated that they did not want to delay the Commission's hearing on the project beyond the April meeting. Second, they decided to modify the project again to eliminate manned kiosks at Bodega Head, Goat Rock and Willow Creek parks and instead propose APPMs at all locations. In State Parks' view, modifying the project to eliminate the kiosks would not require additional CEQA review, information and analysis identified by the public and by Commission staff which would avoid delays in moving the project forward. State Parks ultimately provided their proposed project materials, including the data they developed to support it, in a submittal to staff on March 21st (see **Exhibit 8**). As indicated above, DPR proposes to install APPMs (charging an \$8 fee per day), as well as signs, gates, parking lot improvements, trail repairs, bollards, and related development (including ADA improvements) at the eight referenced State Park parking lot facilities.

### **Project History Conclusion**

On March 21, 2016, DPR sent their modified project proposal to Commission staff. The new project has eliminated the three proposed kiosks, and has eliminated Willow Creek and Freezeout Creek from the project. DPR's modified project proposes to install new APPMs at Stump Beach, at all four Goat Rock lots, at Shell Beach and at two of the three lots at Bodega Head. Additional development, primarily in the form of parking lot improvement, is also proposed; however two new gates and some new trail connectors from the parking lot to existing trails and/or restroom facilities are also proposed.

DPR has significantly revised the project three different times since Sonoma County denied its CDP application in 2013. Instead of proposing 13 iron rangers and no fee system, DPR is now proposing APPMs and a fee system for eight different locations: Stump Beach, all four lots at Goat Rock, Shell Beach and Bodega Head East and West Lots. DPR is also proposing the installation of gates on the road to Bodega Head East and to the Goat Rock Blind Beach parking lot. DPR indicates there are existing gates at the entrance to Stump Beach and at Goat Rock on Goat Rock Road about a quarter-mile from the Highway One/Goat Rock Road intersection.

## **D. COASTAL DEVELOPMENT PERMIT DETERMINATION**

### **Background and Context**

The standard of review for this application is the Sonoma County certified LCP and the public access and recreation policies of the Coastal Act. As noted, the Applicant has modified the project in the time since it was appealed to now propose Automatic Pay Parking Machines (APPM) instead of iron rangers and to propose a new fee payment system, proposing all-day and hourly rates, as well as allowing a 30-minute free period. The Applicant is also proposing to install gates at two of the eight locations as well as to construct various parking lot and trail improvements, primarily designed to provide ADA accessible parking, fee stations and paths to amenities. The project evaluated herein is the project as revised by the Applicant and submitted to the Commission on March 21, 2016.

Sonoma County is considered by many to be the birthplace of the California Coastal Act. In the late 1950's and early 1960's, Sonoma residents discovered that a nuclear power plant had been approved and was being built at Bodega Head. Sonoma County residents stopped the project, but only after a pit had been excavated and some hard development had occurred. Later, when Sea Ranch was proposed as a gated private development along 10 miles of northern Sonoma County coastline, Sonoma residents organized and helped start the Proposition 20 initiative process (i.e., "The Coastal Initiative") and were instrumental in its passage. Sonoma County residents have fought to secure lands for public purposes and much of the land in Salt Point State Park comes as a result of efforts by Sonoma County citizens. Sonoma County residents care deeply about their beaches and want to protect them for public use. Sonoma County residents are proud of what they have fought for all of the residents of California and visitors to the State, and treasure their coastline as an opportunity for low cost public access and recreation for all.

Sonoma County's coastline stretches over fifty-five miles. About one-half of the coastline property is in public ownership, but not all of that land is open to the public with public facilities. The availability of coastal tidelands to the public from Gualala in Mendocino County to Jenner in Sonoma County is quite varied. Some sections of the coast are open to the public, including North Jenner Beach, Fort Ross Historical Park, Salt Point Park and Gualala Point Regional Park. On other large sections, public access is quite limited, most notably from Gualala Point Regional Park to Stewarts Point and within the Timber Cove Subdivision. Access to the Russian River between Duncans Mills and the river mouth is limited to certain areas with the mouth accessible from Jenner and from Goat Rock. The southern portion of Sonoma County has more public access availability since the DPR owns coastal property from the Russian River to Bodega Head. Numerous access points include existing parking lots, trails, trash receptacles, and restrooms.<sup>23</sup>

Along the Sonoma County coast are numerous highway pull-outs and parks that provide views and access to beaches and trails. Between Fort Ross and Jenner, Highway 1 climbs to an elevation of over 600 feet above sea level, among one of the highest points anywhere on California's scenic coastal roadway. Hiking is excellent in State and County parks on the Sonoma Coast. Some destinations are only reachable by trail. Parts of the Sonoma Coast can be reached only on a docent-led hike. Historically the only places where fees have been charged are at locations where camping is also offered and at the historic Fort Ross portion of Sonoma Coast State Park.<sup>24</sup>

The public seeking recreational opportunities has been visiting Sonoma County since 1877 when a railroad reached Duncans Mills from Marin County. Until the 20<sup>th</sup> century, visitors took

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<sup>23</sup> DPR's website for Sonoma Coast State Park indicates that Bodega Head East, Russian Gulch Day Use, Vista Point Day Use, Pomo Canyon Environmental Campground and South Salmon Creek parking are currently closed to the public. Within Salt Point State Park, the Kruse Day Use area is a pack-in/pack-out facility with no trashcans or restrooms available. Woodside Camping area is also closed. It is unclear when DPR closed these facilities and whether DPR discussed permitting requirements associated with these closures with the Commission.

<sup>24</sup> Commission staff has asked DPR staff when fee use was established in each area of Sonoma Coast and Salt Point State Park. DPR has responded with some dates and reference numbers. Commission staff has not yet had an opportunity to verify whether CDPs were obtained for all of these changes in intensity of use.

stagecoaches to the coast from the Russian River area resorts. The first park dedicated on the coast was Fort Ross State Historic Park in 1906. Recreational activity on the Sonoma Coast is dependent on its scenic and natural qualities. Sightseeing is the main purpose of half the trips made to the coast by non-residents of the County on peak summer weekends. Other popular activities include walking on the beach, sunbathing, picnicking, fishing, diving, bird watching, photography and painting.<sup>25</sup>

Sonoma County residents also travel to the coast to enjoy its coastline. Day use of the beaches is very popular because of the accessibility to the population centers of Sonoma County. Many visitors make the loop from Petaluma, up the coast at Bodega Bay, and inland at Jenner to Santa Rosa along Highway 116 along the Russian River.

In order to go to the beach, it often takes approximately a 25 to 30-mile trip to reach the shoreline by car and the same mileage to return home. There is no regular transit serving the coast to and from internal Sonoma or along Highway 1. One can bike to and from the coast, but due to the high elevations of Highway 1, it is a bike ride that not all segments of society are able to do easily. Most residents seeking coastal recreation do so by car. The Bodega Head beaches are very popular and parking areas fill to capacity during the summer months quite quickly, forcing visitors to travel further north to enjoy the coast. Going to the beach in Sonoma right now is an affordable trip for a family provided they have money for gas to and from the coast.

### **Coastal Act and LCP Policy Framework**

Some of the Coastal Act's strongest policy mandates are contained among the Chapter 3 public access and recreation policies (see **Exhibit 9** for relevant policies):

*Section 30210. In carrying out the requirements of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

*Section 30211. Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

*Section 30212. (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or, (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway...*

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<sup>25</sup> Sonoma County LCP, Recreation Overview, page 90.

*Section 30212.5. Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding and overuse by the public of any single area.*

*Section 30213. Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred...*

*Section 30214*

*(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:*

- (1) Topographic and geologic site characteristics,*
- (2) The capacity of the site to sustain use and at what level of intensity,*
- (3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.*
- (4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.*

*(b) It is the intent of the Legislature that the public access policies of this article be carried out in a reasonable manner that considers the equities and that balances the rights of the individual property owner with the public's constitutional right of access pursuant to Section 4 of Article X of the California Constitution. Nothing in this section or any amendment thereto shall be construed as a limitation on the rights guaranteed to the public under Section 4 of Article X of the California Constitution.*

*(c) In carrying out the public access policies of this article, the commission and any other responsible public agency shall consider and encourage the utilization of innovative access management techniques, including, but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.*

*Section 30220. Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.*

*Section 30221. Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.*

*Section 30223. Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.<sup>26</sup>*

The Sonoma County certified Local Coastal Program (LCP) also contains strong public access and recreation policies. It cites the California Constitution provision mandating the protection and enhancement of public access to and along California's coastline:

*Article XV, Section 2 of the California Constitution provides: no individual, partnership, or corporation, claiming or possessing the frontage or tidal lands of a harbor, bay inlet, estuary, or other navigable water in this State, shall be permitted to exclude the right of way to such water whenever it is required for any public purpose, nor to destroy or obstruct the free navigation of such water; and the Legislature shall enact such laws as will give the most liberal construction to this provision so that access to the navigable waters of this State shall be always attainable for the people.*

The Sonoma County LCP also cites Sections 30210, 30211 and 30212 of the Coastal Act, as well as Section 30604(c):

*Every coastal development permit issued for any development between the nearest public road and the sea or the shoreline of any body of water located within the coastal zone shall include a specific finding that such development is in conformity with the public access and recreation policies of Chapter 3 (commencing with Section 30200).*

The LCP also states the following under County responsibilities:

*The County shall take all necessary steps to protect and defend the public's constitutionally guaranteed rights of access to and along the shoreline...*

The LCP, adopted in 2001, contains an Access Plan that provides specific descriptions of various park facilities and policies (called "recommendations" in the plan) regarding the use of those facilities. As stated in the introduction and summary section of the LCP, the recommendations are meant to serve as "specific statements of policy intended to implement State Coastal Act policies... They also address development of appropriate recreation and access facilities..." The LCP Access Plan contains references to all eight sites currently proposed for fee usage by DPR. In some instances, there is a specific reference, and in other situations, the Access Plan refers to

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<sup>26</sup> With its March 21st submittal, DPR has included an argument that Coastal Act Section 30401 applies to the Commission's analysis of DPR's proposal. DPR suggests that since DPR is granted statutory authority to assess fees pursuant to Public Resources Code Section 508, that authority cannot be superseded by the Commission pursuant to Section 30401 of the Act. (Public Resources Code Section 5010, not Section 508, addresses DPR's authority to collect fees.) However, assessing such fees constitutes "development" as defined by the Coastal Act because it causes a change in the intensity of use of both land and the public's ability to access the water. The Commission has routinely required CDPs for new and increased fees at public access and recreation facilities. Moreover, Coastal Act Section 30402 requires all state agencies to carry out their responsibilities in conformity with the Coastal Act.

the Recreation Plan, which consists of a series of policies and maps in the LCP's Appendix. The applicable LCP sections state:

*17. Salt Point State Park – improved (Stump Beach)*

*Discussion: See Recreation Plan*

*The Recreation Plan for the Stump Beach Cove Area: No changes (parking, picnic, and pit toilet facilities are located just west of the highway with trail leading to the sandy beach).*

*43. Goat Rock River Access – Dedicated and improved*

*Discussion: Four accessways are available from Goat Rock Road.*

*Recommendations: No Change*

*46. Goat Rock Ocean Access – Dedicated and Partially improved.*

*Discussion: Four accessways are available from Goat Rock Road.*

*Recommendations: No Change*

*48. Shell Beach – Dedicated and Improved*

*Discussion: State Parks operates this accessway to Shell Beach. A safe trail, parking for 40 cars, and restrooms are available. Lateral access between Shell Beach and Wright's Beach is hindered only by one bluff promontory. A staircase up and over this bluff would allow hiking along nearly 2 miles of beach.*

*Recommendations: 1. No change in vertical access. 2. Develop a trail connection and staircase, as appropriate between Shell Beach and Wright's Beach.*

*60. Bodega Head – Dedicated and Partially Developed*

*Discussion: Numerous trails, roads, two parking areas, and restrooms are located at Bodega Head. For additional information and recommendations, see Recreation Plan.*

*Recreation Plan:*

*Bodega Head is well known as the site where a nuclear power plan was proposed in the 1960's. A deep hole excavated for the project is now a fresh water pond valuable as bird habitat and used currently (1980) as an experimental salmon raising site. Bodega Head is generally used for picnicking, short hikes, and viewing the coast, whale migration and Bodega Bay.*

*The University of California Bodega Marine Reserve is located to the north of Bodega Head and south of the Bodega Dunes Campground. Any recreational development at Bodega Head should be limited to low-key day use activities to minimize conflicts with the Reserve*

The recreation section of the LCP includes a discussion on the existing danger and visual resource impacts associated with parking along Highway 1 and the need to design parking lots to accommodate summer visitor demand in close proximity to trailheads. The discussion of development criteria for access facilities notes the following regarding parking areas:

*Parking Areas. Parking lots should be located within one-half mile of the trail head. The current practice of parking along Highway 1 is often inconvenient, hazardous, slows traffic, and is visually undesirable. Well designed and screened off-road parking should be developed with a number of parking spaces based upon the capacity of the access destination. Existing accessways will need lots sized to accommodate the number of cars parked along the roadway on a typical summer weekend. In areas that have not been used for recreation on a regular basis, lots should accommodate no more than ten to fifteen cars.*

The specific Access and Recreation Plan recommendations contained in the LCP provide a means to guide development of parking facilities to in part, manage the off-road parking problems in addition to the more general policies stated below:

*7. Design parking and restroom facilities to serve only the planned intensity of recreation development.*

*9. Locate parking in visually screened areas.*

Similarly, Sonoma County LCP transportation policies require wide accessibility of public parking facilities at coastal beaches, mitigation of environmental and visual impacts in parking lot development, and reduction of hazardous parking turnouts as follows:

*14. Mitigate environmental and visual impacts in parking lot development or expansion.*

*15. Locate parking areas to provide wide accessibility to coastal beaches rather than consolidating parking facilities.*

*16. Close small, poorly located turnouts.*

Finally, the LCP requires the protection of environmentally sensitive resource areas including dunes and coastal strands, wetlands, and coastal bluffs. The LCP sensitive habitat policies guide public access development in and around these sensitive resources in a manner that will limit impacts to these resources as follows:

*6. Prohibit all off-road, non-authorized vehicles from dune areas.*

*7. Minimize foot traffic for all permitted uses, including recreation, on vegetated dunes. Where access through dunes is necessary, well-defined footpaths or raised boardwalks shall be developed and used. Access areas should be posted with explanations describing the importance of use of limited access routes for the purpose of protecting the plant communities.*

*8. Identify wildlife nesting and breeding habitats of rare or sensitive plants or animals for the publicly owned dune areas in order to temporarily restrict access to these areas during identified breeding and nesting seasons.*

*17. Exclude all motor vehicles from wetlands. Pedestrian and equestrian traffic should be directed to specific areas with facilities provided to eliminate adverse impacts on biological resources.*

*43. Prohibit all off-road non-authorized motor vehicle traffic on bluff areas in order to limit compaction, erosion, and destruction of plants. Equestrian traffic should be directed to areas where the subsequent compaction and erosion do not adversely affect the stability of the bluffs.*

*44. Minimize recreational use of bluff sites known to be used by birds as nesting or roosting areas.*

*45. Design access points (stairways or trails) which pass through coastal bluff habitat to minimize erosion and disruption of bluff vegetation. Public access must be limited to the trailway corridor.*

*Stump Beach Cove Area*

*No changes (parking, picnic, and pit toilet facilities are located just west of the highway with trail leading to the sandy beach).*

## **Public Access and Recreation Analysis**

### **Section 30210**

The California Constitution and the federal Coastal Zone Management Act<sup>27</sup> mandate the protection and enhancement of public access to and along California's coastline. The Coastal Act redoubles these protections, including mandating that public recreational access opportunities to and along the California coastline be maximized (Coastal Act Section 30210). Coastal Act Section 30210's direction to maximize access represents a different threshold than to simply provide or protect such access, and Section 30210 is therefore fundamentally different from other like provisions in this respect. It is not enough to simply provide public access to and along the coast, and it is not enough to simply protect public access, rather such public access must also be maximized. This terminology distinguishes the Coastal Act and provides fundamental direction to projects along the California coast that raise public access issues like DPR's proposal.

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<sup>27</sup> The federal Coastal Zone Management Act requires its State partners to "exercise effectively [its] responsibilities in the coastal zone through the development and implementation of management programs to achieve wise use of the land and water resources of the coastal zone" (16 U.S.C. Section 1452(2)) so as to provide for "public access to the coasts for recreational purposes." (Section 1452(2)(e))

The Commission has been working with DPR on a coordinated statewide approach to managing coastal access in state parks that recognizes and harmonizes both agencies' jurisdictional responsibilities, with the specific goal of meeting the Coastal Act's policies of maximizing public access and protecting lower cost visitor serving recreational opportunities on public land, while also recognizing and addressing recent legislative and administrative direction to DPR to create new revenue streams to fund facility management and operations throughout the state parks system.

Although the Commission recognizes DPR's statutory responsibility and mandate to manage access and recreation in the state parks, new fee programs have the potential to adversely affect the ability of the public to access the shoreline, which is one of the Coastal Commission's primary responsibilities. The maintenance of lower-cost options for beach access and recreation is a specific Commission concern to assure that rates are not driven solely by increased demand, such as holidays or peak season, such that some segments of the population are priced out of recreational opportunities at the coast. Instituting new fees where there were previously no fees may have adverse effects on visitation levels in specific locations and can serve to adversely affect public access, particularly when the revenues are not necessarily plowed back into the facilities where they are collected.

Section 30210 states that maximum access shall be provided for all of the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse. To their credit, DPR has modified the fee parking program from what was originally proposed, as a result of input from stakeholders and the public, reducing the number of fee parking areas from thirteen (13) to eight (8). In addition, DPR has proposed hourly rates at each site and a 30-minute free "surf check" at each site which does reduce the parking fee for those who do not wish to spend a whole day at the beach. However, DPR's fee program as currently proposed is not consistent with Section 30210 of the Act. It will diminish, not maximize access, and will not protect existing low cost recreation. DPR's proposal will result in only those that can afford to pay being able to access the coast in many of these remote beach locations. Others who can't afford to pay will be shut out of this access system. For example, the public cannot get to the water at Goat Rock without traversing Goat Rock Road to one of the two parking lots located adjacent to the shoreline. Goat Rock Road from Highway 1 to the beach is more than 1.7 miles, meaning that a minimum 3.4-mile round-trip walk would be required (and potentially farther depending on where parking along Highway 1 could be obtained). This distance may be prohibitively long for many people, particularly given the steep slope of the roadway on its descent to beach level.

Bodega Head is the headlands area between the Pacific Ocean and Bodega Harbor. It is well known as a site from which to observe gray whales during their annual migration. Similar to the situation at Goat Rock, visitors who cannot or who prefer not to pay a parking fee would have few options absent this free and open beach but to walk to the Pacific Ocean side of Bodega Head starting from a parking space in a lot or roadside pullout located along Bodega Harbor. This is a one-mile round-trip walk, at the very minimum, and would involve climbing and descending the steep terrain of the headland area. It could be a challenging or prohibitively difficult trip for many people.

Stump Beach is one of the very few sandy beaches located in Sonoma County north of Jenner. Roadside pullouts exist within Salt Point State Park, and there is a pullout located directly across Highway 1 from the Stump Beach parking lot, on the inland side of Highway 1, where a handful of cars might be able to park. If the pullout were full, visitors who cannot pay a fee would either have to hike into Stump Beach via a trail, or would need to park at a roadside pullout further away and walk along Highway 1. Walking along Highway 1 in this location presents a significant safety concern. The Stump Beach entrance is on a portion of the highway which is shadowed during much of the day by the forest canopy, and there are no roadside shoulders along the highway in places. It would be very unsafe for pedestrians to walk for a half mile along Highway 1 to the next pullout area, as visibility is low, and at points pedestrians would be forced to walk directly in the traffic lane.

With respect to Shell Beach, the Commission notes that DPR proposes charging at this beach, which can only be accessed by car, since there are very few residents near Shell Beach, but DPR has not included the Salmon Creek parking areas and beach, which are also very popular beach areas. Salmon Creek has existing residential neighborhoods nearby, so Sonoma County residents in this area could continue going to the beach for free, while visitors to the area would have to drive and park in the two parking areas. The two Salmon Creek lots are paved and have bathrooms. South Salmon Creek is one of the most heavily used beach access points in Sonoma County. Existing parking is inadequate. Heavy usage results in dune damage and dune destabilization. If DPR starts charging at Shell Beach, more members of the public may attempt to use the Salmon Creek parking areas to reach the beach, potentially causing impact to the dunes and causing further traffic and parking impacts in the adjacent residential neighborhoods. Visitors may also be forced to utilize less safe State Park beach areas with few or no public amenities such as exists at Portuguese and Schoolhouse Beach, which provide little more than a parking area and a dirt path to a shallow sandy beach area.

In its most recent March 21, 2016 submittal, DPR states that Section 30210 of the Act emphasizes the mandate of maximum public access but “acknowledges that there must be limits.” Section 30210 only directs that maximum access be provided in a manner consistent with: 1) public safety needs; 2) public rights; 3) private property rights; and 4) protection of natural resources. DPR has not argued for the establishment of a fee collection system under any of these four factors. DPR’s proposal to charge is likely to result in more unsafe parking conditions along Highway 1, in roadside pullouts and in unauthorized parking areas. DPR’s proposal is likely to cause the public to park on the inland side of Highway 1, forcing dangerous Highway 1 pedestrian crossings in order to access the shoreline. Public rights to access the shore are not being protected in this proposal. Finally, DPR’s proposal will likely cause impact to natural resource areas as the public tries to avoid fee parking areas and parks along Highway 1 near beaches they desire to visit, and creates new volunteer trails through coastal resource areas to get to and from the beach.

Unless members of the public who use these beaches have the ability to pay a parking fee, DPR is effectively prohibiting beach access for those who cannot pay by charging fees, given the nature of the shoreline in Sonoma. This prohibition will fall disproportionately on the low income and disadvantaged among the public. The Commission finds that DPR’s proposal to charge fees at Goat Rock parking areas, Stump Beach, Shell Beach and the two parking areas at Bodega

Head is not consistent with Section 30210 because it does not protect existing access to and along the water, it does not enhance public access to and along the water and it does not maximize public access to and along the water.

Despite the propensity of beach parking fees to interfere with public access, especially by lower income populations, they can nonetheless be found consistent with Section 30210 when adequate evidence is submitted demonstrating that particular proposed fees are unlikely to have that effect.<sup>28</sup> Here, however, DPR has not presented such evidence. DPR's baseline monitoring effort did not include monitoring of all eight proposed areas or all roadside pullout and other informal areas used by the public throughout the summer months. It did not include statistical evidence to support DPR's claim that minimal impacts on attendance have resulted from prior parking fees being imposed or increased. DPR's submittal did not include a program for monitoring any adverse environmental impacts and did not suggest mitigation to address any potential reductions in access that might occur as a result of the fees. DPR's submittal was inadequate with respect to impacts associated with changes in user trends, including cumulative impacts with respect to ESHA and public safety. DPR has not submitted any evidence that they consulted with the County Sheriff, the California Highway Patrol and with Caltrans regarding the public safety issues. The Commission finds the proposed project inconsistent with Section 30210 of the Coastal Act.

### **Section 30211**

Section 30211 requires that development not interfere with the public's right of access to the sea where acquired through use or legislative authorization. Within the area proposed for fees are established public hiking trails; some of which are segments appropriate for inclusion in the California Coastal Trail (CCT), which in Sonoma, primarily traverses along Highway One. The Kortum Trail, named after former County Supervisor Bill Kortum, is nearly 4 miles in length, starts at Wright's Beach in the south, can also be accessed at Shell Beach, and extends to Blind Beach within Goat Rock to the north. Supervisor Kortum was instrumental in the acquisition by the State of the land that now makes up Salt Point State Park. The Pomo Canyon Trail starts from the Shell Beach parking lot and winds over the hill 3.5 miles to the Pomo Canyon Campground. The Commission finds that the Kortum Trail and Pomo Canyon Trail are public trails that must be protected for maximum public use. DPR's proposal would mean that the public would have to either pay to use the trail (at Wright's Beach, Shell Beach and Goat Rock), compete with other members of the public wishing to avoid a fee by parking on existing County subdivision roads (near Shell Beach) potentially causing an impact to traffic flow on those County roads, compete to park in a total of 7 available spaces at Wright's Beach blufftop parking area that provides access to the Kortum Trail, or be forced to find parking along Highway 1 in order to get to the trail.

Many of the hiking trails in Sonoma were formalized from trails established through public use. Sonoma county residents are responsible for hundreds of volunteer hours spent in the two State Parks, and continue to volunteer to enhance these coastal access resources. DPR counts on its volunteers as necessary partners in managing its holdings. Stewards of the Coast and Redwoods has been identified by DPR as one of its most valued partners, and Stewards provide countless

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<sup>28</sup> See *Id.* at 156.

volunteer hour service to DPR at the Sonoma County beaches. Stewards help to provide educational and ecological volunteer assistance with the public, and also perform other duties to improve their State Parks. Land Paths, another Sonoma County non-profit, has organized hundreds of volunteers to build trails and protect resources. Other Sonoma County non-profits and volunteers have helped DPR to keep open the Petaluma Adobe, Jack London State Historical Park, the Fort Ross State Historical Park and Sugarloaf State Park in Sonoma County. Sonoma County Agricultural and Open Space District provided more than 10 million dollars (more than half the purchase price) for the public acquisition of Willow Creek. The County Agricultural and Open Space District derives its funding from sales taxes collected from Sonoma County visitors and residents in Sonoma County.

In many ways the ‘fee for parking’ proposal is actually a ‘fee for beach use’ proposal given the nature of access to this particular stretch of coast. Beach and related public access to the Sonoma Coast essentially requires the beach and access consumer to also have a vehicle, and thus entry into this particular access system is already more costly than others (e.g., others where there are easy alternatives for access, where there are good transit and alternative transportation modes to get to the beach, etc.). Thus, access to and along the shore already costs users in this particular system, and keeping that cost as low as possible is key. The proposed fee program will serve to increase the cost of access, including beach access as described above, and will fall disproportionately on those least able to afford it. This does not protect existing access, including beach access. Because DPR’s proposal does not protect existing access, the Commission finds the proposal inconsistent with Section 30211 of the Act.

As with Section 30210, DPR has not submitted adequate analysis or evidence that the proposed project will avoid interference with the public’s right of access to the shoreline nor does it propose any substantive mitigation measures to provide lower cost or free access to low income users.

**Section 30212**

Section 30212 of the Act requires new development to provide access from the nearest public roadway to the shoreline and along the coast except where it is inconsistent with public safety, military security needs or the protection of fragile coastal resources, or where adequate access exists nearby. The Commission finds that DPR’s proposal will serve to limit access from the nearest public roadway to the shoreline and along the coast and that adequate access does not exist nearby to offset such limitations at the eight areas proposed to charge fees for access. The limitation is not being done for public safety, military security needs or for the protection of fragile coastal resources, or because adequate access exists nearby. DPR’s limitation on access is being proposed because of a stated need to generate revenue for department operational needs.

DPR’s proposal to limit access will likely cause more public safety issues because adequate access is not nearby. As previously described, each area has its own constraints and charging fees at the proposed locations will likely result in the following adverse impacts to access from the nearest public roadways in the following ways: 1) charging at the two lots at Bodega Head will likely cause the public seeking to avoid fees to seek out Campbell Cove and parking along the road leading to Bodega Head; 2) charging fees at Shell Beach will likely cause the public seeking to avoid fees to compete for the few free spaces on existing County roads and at the 7-

space Wright's Beach bluff parking area, or park along the shoulders of Highway 1; 3) charging fees at Goat Rock will likely prevent the public from easily accessing the shoreline at the mouth of the Russian River or the Kortum Trail; and 4) charging fees at Stump Beach will likely make getting to the shoreline a much harder proposal and will likely cause public to park in potentially unsafe locations along Highway 1.

Finally, fragile coastal resources could be adversely impacted by this proposal. Members of the public wishing to avoid fees, or who cannot pay, will park along the Highway and most likely will create new and/or use existing volunteer trails to get to and along the shoreline. These volunteer trails could impact biological, cultural and other fragile coastal resources. Because DPR's proposal does not assure against adverse impacts to existing public access and sensitive coastal resources, the Commission finds the proposed project inconsistent with Section 30212 of the Act.

As with Section 30210, DPR has not submitted sufficient analysis or evidence that the proposed project will provide adequate access to the shoreline and will protect fragile coastal resources.

**Section 30212.5**

Section 30212.5 requires public facilities, wherever appropriate and feasible, including parking areas, to be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area. DPR states that this section of the Act recognizes overcrowding and overuse as significant issues requiring active management efforts, and thus it is their opinion that it is precisely what their proposal calls for. DPR has stated that free parking will continue to exist at parking lots within Sonoma Coast State Park, at 31 roadside pullouts with coastal and/or beach access between Salmon Creek and Russian Gulch, and at dozens of roadside pullouts with coastal and/or beach access between Fort Ross State Historic Park and the northern boundary of Salt Point State Park.

DPR has not submitted information concerning usage of the 31 roadside pullouts between Salmon Creek and Russian Gulch, or at the roadside pullout areas between Fort Ross and the northern boundary of Salt Point State Park. Further, DPR's proposal does not result in evenly spacing free and paid facilities along the Sonoma Coast. DPR's proposal would result in all coastal portions of Salt Point State Park where there is safe public parking being subject to fee parking. The only free parking available in Salt Point would be located at the Kruse Rhododendron State Natural Reserve, if that day use facility is even open to public use<sup>29</sup> located inland of Highway 1 and 1.5 miles north of the Stump Beach parking lot proposed for a fee. Within Sonoma Coast State Park, DPR proposes to charge at all Goat Rock locations and Shell Beach, precluding free beach usage for a significant portion of the southern Sonoma Coast State Park coastline. Portuguese Beach, Schoolhouse Beach and the Salmon Creek lots are not being proposed for charges and will quickly fill as a result, forcing the public to seek beaches subject to parking fees located elsewhere.

The pocket beaches within Sonoma Coast State Park are less than ideal for families seeking safe recreation since all that is currently provided at these pocket beaches is a parking area and a

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<sup>29</sup> DPR's website lists the Kruse day-use area as being closed currently to public use.

pathway to the beach. Salmon Creek lots fill to capacity very quickly already, forcing beachgoers to find parking on adjacent residential streets. Maintenance costs at Salmon Creek are high due to the shifting dunes and the need to clear parking areas. DPR's proposal to not charge at Salmon Creek but to charge at Bodega and elsewhere will only cause more of the public to seek out Salmon Creek as a free beach with amenities. The Commission finds that DPR's proposal is inconsistent with Section 30212.5 because the proposal will cause overcrowding and overuse of coastal areas, as noted above, that will likely result in adverse impacts to coastal resources.

**Section 30213**

Section 30213 requires that lower cost visitor and recreational facilities be protected, encouraged and, where feasible, provided. DPR acknowledges that this section of the Coastal Act promotes facilities and access for those who are least able to afford to pay; however DPR states that Section 30213 does not prohibit fees from being required at all coastal locations. DPR suggests that its modified proposed project maintains free day use parking areas around and within the vicinity of proposed fee areas. DPR also states that they offer a \$5 Golden Bear Pass to any qualifying person and other passes to assist the disabled and honorably charged veterans.

Many Sonoma County beach visitors are local to Sonoma, Marin and Mendocino counties and make frequent trips to both State Parks. Many others come from the Central and Sacramento valleys during the summer months. DPR estimates that household incomes for visitors are relatively high with 57% earning over \$75,000 annually and only 15% earning less than \$40,000. Based upon collection of visitor zip codes, DPR states that a majority of visitors are from the Sacramento and North San Joaquin Valley. Sacramento is the most common visitor origin while Sonoma County comes in fifth.<sup>30</sup>

With respect to Sonoma County residents, the Sonoma County Economic Development Board states that 11.3% of its population lives below the poverty line. Latinos make up 26% of Sonoma County's population and 19.6% of Sonoma County Latinos are living below the poverty line. In Sonoma County schools, Latinos make up 43% of the school population and 46% are Caucasians. Asian/Pacific Islander, African American and Native American students compose an additional 7% of the student population. Approximately 23% of the school population is learning English and 48% of Sonoma County public education students are socio-economically disadvantaged. In Sonoma County 43% of the school children are eligible to receive free and/or reduced lunch with 27.4% actually participating.<sup>31</sup>

DPR's proposal will result in fees being charged at locations in Sonoma County where fees have never been charged. This will result in fewer lower cost visitor and recreational facilities being

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<sup>30</sup> DPR cites their reference for these numbers as coming from NOAA (2015). *A Socioeconomic Profile of Recreation Users of the California Northern Central Coast Region, Greater Farallones National Marine Sanctuary and the northern portion of Monterey Bay National Marine Sanctuary, 2011, Silver Spring: U.S. Department of Commerce.*

<sup>31</sup> Email correspondence from Marcos Suarez, Sonoma County Economic Development Board to Susan Upchurch on March 28, 2016.

available. The eight locations proposed for fees are located in a county that offers significant coastal access and recreation opportunity to a diverse socioeconomic cross-section of people as demonstrated in the county school statistics above. The eight locations that are currently considered to be low cost visitor recreational facilities will no longer be protected, encouraged or provided for the public as free facilities, inconsistent with Section 30213 of the Coastal Act.

With respect to the maintenance of free day use parking areas around and within the vicinity of the proposed fee areas, within Salt Point Park, the only remaining safe free area to park will be the Kruse Reserve, which is located a mile plus away from the shoreline at Stump Beach. With respect to free day use, it is non-existent along the coast in Salt Point Park. In Sonoma Coast State Park, the public will be forced to park along Highway 1 in the Caltrans' right-of-way in order to access Goat Rock. There is limited to no parking available along Highway 1 in this location. At Shell Beach, DPR points to an existing County road adjacent to the paid parking lot at Shell and suggests that the public can easily park there. This road is not under the control of DPR, and belongs to the County. There is no evidence of coordination between DPR and the County regarding continued public use of this road, or any offer of assistance to the County by DPR concerning the funds needed to continue to maintain this road area as a public parking area. There is an existing blufftop parking area overlooking Wright's Beach that would allow access to the Kortum Trail and presumably from that trail to the shore; however, the existing parking lot provides only 7 spaces and no support services at this location. The remaining free portions of Sonoma Coast State Park have been previously discussed as being small pocket beaches with minimal services (no restrooms) and areas that quickly fill to capacity on hot days.

As they have stated, DPR offers several low or no-cost passes to certain eligible individuals. Persons with a permanent disability are eligible to purchase a lifetime pass entitling the user to a 50% discount on all park fees for a cost of \$3.50. The Distinguished Veteran Pass is free to honorably discharged veterans and entitles the user to free day use, camping and boat use at all units of the state park system. The Golden Bear Pass is available for a \$5 fee to any qualifying person who receives Supplemental Security Income (SSI); any person receiving aid under aid codes of CALWORKS or any person 62 years of age or older with an income limitation. The Golden Bear pass entitles the holder and their spouse or partner free entry to most State park operated units. DPR also offers a Limited Golden Bear Pass for \$20 to any persons aged 62 or older. This entitles the bearer and spouse or partner free entry to most State Park-operated units during non-peak season. If one does not qualify for any of those passes, DPR offers the Golden Poppy Pass at a cost of \$125 per year which provides entry to most State Parks except for Hearst Castle and Southern California beaches. DPR also runs a "Volunteer in Parks" program in which volunteers can earn local or Statewide day use passes in return for volunteer services.

While these are programs that provide relief to the very poor, the disabled community, honorably discharged veterans and persons older than 62, as well as to volunteers, they do not offer much to low or moderate income households, who do not have the time to work as a volunteer to earn one free day at the beach a year. In order to get the Golden Bear Pass, one must prove economic status at poverty level income, bring last year's tax returns and make a special visit either to Sacramento during the working week, or to a District DPR office to procure such a pass.

In its revised March 21, 2016 submittal, DPR indicates that it is working on a local pass for Sonoma County, but has not provided specific details as to what will be proposed or at what price. Sonoma County has indicated an interest in working on this issue with DPR, but nothing has been resolved regarding the availability of such a pass. DPR and the County should continue their efforts to create a single pass that can be used in either State parks or County parks. The Commission finds that DPR's pass program is lacking when considered in concert with the current proposal to charge fees at beaches that serve a diverse socioeconomic group. While the pass program provides some benefit to low-income persons, the program as a way to mitigate the adverse impacts to coastal access by the current proposal does not ensure that lower cost recreation and facilities are adequately protected, encouraged or provided for all segments of the public, inconsistent with Section 30213 of the Coastal Act.

**Section 30214**

Section 30214 states that the implementation of the Coastal Act's public access policies need to take into account the need to regulate the time, place and manner of public access depending on such factors as topography, geology, site capacity, intensity of use, the appropriateness of limiting access to pass and repass due to fragile natural resources or proximity of access nearby and the need to manage access areas to protect the privacy of adjacent residents and to protect the aesthetic values of an area. DPR states that Section 30214 of the Act's intent is to recognize that there must be limits to free and unrestrained public access. DPR states:

*Access should be made in a reasonable manner and what may be reasonable at one location may not be reasonable in the next. Wholesale free-for-all beach access in a park unit that has 3 million visitors, suggest that thoughtful consideration be given to a site's characteristics in determining what Maximum Public Access means to that specific site.*

DPR estimates that Sonoma Coast and Salt Point State Parks receive approximately 3,275,000 visitors a year. DPR argues that all facilities within Sonoma Coast and Salt Point should not have to be free for this amount of annual visitation.<sup>32</sup> All facilities located within the two State Parks are not free currently. In fact, there are already existing places within both State Park Units that do charge a daily fee: within Salt Point Park, fees are already charged at North and South Fisk Mill, at Gerstle, at Woodside, at Fort Ross and at Reef.<sup>33</sup> Charging at Stump Beach would leave the inland Kruse Rhododendron Reserve and Windermere as the only free locations within Salt Point Park (**Exhibit 10**). Within Sonoma Coast State Park, there are already fees charged at Wright's Beach and at Bodega Dunes.

Commission staff has been working with DPR staff toward development of a coordinated approach to managing coastal access with the goal to maximize public access and protect lower cost visitor and recreational opportunities on public land, while recognizing recent legislative direction to DPR to create new revenue streams to fund facility management and operations

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<sup>32</sup> Obviously, the parks are not private parks but rather are public facilities that tax payers in the State of California support, so the public already 'pays' for these parks, and in that sense they are not 'free'.

<sup>33</sup> Commission staff has not been able to confirm existing fee-charged areas obtained CDPs for charging these fees. In most instances, these locations offer camping facilities or are designated as historic locations, like Historic Fort Ross.

throughout the State Park system. The two agency commitments are reflected in letters from both agencies attached as **Exhibit 8**, starting at page 104.

Consistent with these 2013 letter agreements, the Commission has approved the imposition of increased fees in several locations, and new fees in at least one location, in Southern California. In all of these instances, as in the 1991 CDP approval for fees in Sonoma County locations, the Commission indicated it could only determine DPR's requests for fee collection systems consistent with a requirement of mitigation in order to determine consistency with the Coastal Act's public access and recreation policies. The Commission determined, in all of these past decisions, that many of DPR's predictions concerning reactive public use after fees are imposed had never been statistically demonstrated in submitted monitoring data.

In June 2013, the Commission conditionally approved 3 CDPs to allow for the installation of APPMs in Orange County and included requirements for a monitoring program to be implemented. CDP No. 5-13-0349 allowed the installation of APPMs and the establishment of a flexible parking fee program at five locations: Reef Point, Pelican Point, Los Trancos, Moro Day Use and Moro campground. Fees are currently collected at all of the proposed locations. CDP No. 5-13-0350 allowed the installation of an APPM and implementation of a flexible parking fee program at Doheny State Beach Park, as well as a monitoring program to demonstrate how parking fees and discount parking opportunities affect public use and revenue collection. Fees are currently collected at Doheny State Beach Park through a staffed kiosk or entry station. CDP No. 5-13-0451 allowed the installation of APPMs and the implementation of a flexible fee collection program at two locations: a beachfront parking lot at end of Avenida Calafia and at a day-use lot at San Clemente State Beach campground. Fees are currently collected at both locations. CDP No. 5-13-0451 also included a monitoring program requirement similar in content to the one proposed by DPR in CDP No. 5-13-0350. All three CDPs were conditioned to be 5-year CDP authorizations, with DPR being required to apply to extend the CDPs beyond the 5-year period. All three CDPs required monitoring programs with annual reports being submitted by DPR. The three CDPs also indicated that should the Commission be asked to consider any proposed extension or modification of the CDP authorizations by DPR, that the Commission would consider and address any impacts to access and visitation patterns identified in the approved monitoring programs.

In January 2014, the Commission conditionally approved another CDP to allow the installation of APPMs and the implementation of a flexible fee program at two parking lots within San Onofre State Beach in San Diego County: at the Trestles and San Onofre Bluff parking lots. The CDP application included a proposed monitoring program similar to the three CDPs granted by the Commission in Orange County. Fees had been collected since prior to the Coastal Act at the San Onofre Bluff parking lot. The parking lot at Trestles had two iron rangers previously installed, but no evidence of a CDP for the installation. The Commission conditioned this CDP to be valid for five years with similar monitoring program requirements.

The three Orange County CDPs are not due to expire until June 2018, and the San Diego CDP will not expire until January 2019. In all four instances, DPR has not yet submitted any of the required annual monitoring reports. DPR and the Commission staff have yet to agree on the parameters of an acceptable monitoring program for any of the five CDPs, let alone had one

implemented by DPR at any of the locations. Therefore, the perceived impacts to public access and recreational opportunities that were identified by the Commission in these permit decisions have not been quantified, assessed, or mitigated by DPR. The Commission has not received any of the required monitoring data necessary to assure consistency and therefore the impacts of fee imposition at these locations has not been fully evaluated, inconsistent with the terms and conditions of these CDPs. The Commission cannot determine that the proposed fee collection systems imposed in these past CDP decisions are necessarily consistent with the Chapter 3 public access and recreation policies of the Coastal Act.

Ideally, any such previously approved fee program's monitoring reports could be used to design a programmatic approach to fee collection at state coastal parks where appropriate across the State. Such an approach could be designed to have generally applicable program aspects, as well as location-specific determinative factors to help guide the application of fees at state coastal parks where appropriate statewide. Additionally, if the monitoring reports for past fee programs had been executed, such data could help Parks and the Commission devise a mitigation program to help to alleviate the adverse impacts to public access that this report's findings contemplate. However, no such monitoring has been done for these fee programs, and therefore, this proposal has no guiding principles on which to base a monitoring program that could be successfully implemented.

In November 2012, the Commission issued CDP No. 2-12-019 to the City of Pacifica for the installation of parking meter ticket machines and the imposition of a parking fee program at Pacifica State Beach (also known as Linda Mar Beach) in Pacifica.<sup>34</sup> Linda Mar Beach is located in an urbanized portion of the coast, and many visitors walk or ride bicycles to the beach. Public transit options also exist. Parking fees collected via the fee program are used to cover costs associated with managing and maintaining Pacifica State Beach and related facilities, including primarily for the employment of two new rangers to manage and watch over the beach area, as well as to protect existing coastal sand dunes and snowy plover habitat. The City parking lots remain open 24 hours a day with fees imposed from 8AM to 8PM. The Commission's approval required a monitoring program from the City as well as annual project reports and authorized the program for five years, or until November 2017. The City has submitted an approved monitoring program and has started the process of submitting annual reports; however the impacts of fee imposition have not been fully assessed as only one annual monitoring report has so far been submitted. Prior to implementing the program, the City did monitor all proposed fee locations as well as several adjacent "free" alternative locations available to the public wishing to avoid paying a fee as a means of establishing some baseline data. Virtually all of the alternative areas are either existing paved parking lots in shopping centers or a regional bus parking lot, as well as on-street parking. Unlike the available alternative parking areas in Sonoma County, the public using these alternative Pacifica spaces can safely exit their vehicles, cross Highway 1 at a signal light intersection and crosswalk to obtain access to and from the State Beach. Unlike the other CDP approvals, this CDP requires 100% of the revenue collected to be spent directly on managing and improving the Linda Mar beach experience for those who use the beach.

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<sup>34</sup> DPR transferred management of Pacifica State Beach to the City in 1990, at which point the City assumed primary responsibility for operational management and maintenance subject to the terms of a 1991 agreement between DPR and the City.

Based upon this past precedent, the Commission cannot find DPR's current proposal or analysis concerning the provision of public access consistent with Section 30214 of the Act. In every CDP granted by the Commission for fee collection systems to be implemented, DPR has failed to comply with those conditional monitoring requirements the Commission found necessary in order to approve CDPs for new fee collection systems. Thus, the Commission cannot assure that its previous approvals have been fully mitigated. Further, the Commission cannot rely on DPR's willingness to have similar requirements imposed upon them in the subject application, since DPR has not been able to comply with this requirement in the past.

DPR states that in 2013 the then-director of DPR, Major General Anthony Jackson, met with the then executive director of the Commission, Dr. Charles Lester, to reach an understanding on permitting issues related to self-pay stations to be installed in coastal state park units (**Exhibit 8**, starting page 104). From that understanding, a list of approaches that DPR should consider was developed. In the revised proposal submitted on March 21st, DPR states that to the extent that the approaches are applicable, they have been incorporated into the current proposal. Unfortunately, the Commission must disagree with DPR's assessment of incorporation of the 2012 agreement between the two agencies into the revised project. As noted in Dr. Lester's letter:

- *CSP will endeavor to consult with the CCC and/or local government in advance of undertaking development that may trigger coastal development permitting requirements under the Coastal Act or a certified LCP. **When permits are required, CSP will work with the CCC and local governments to identify and provide necessary information and meet any other relevant processing requirements.** The CCC will endeavor to coordinate with CSP and local governments acting under their LCPs where appropriate.*
- *CSP and the CCC will work collaboratively to assure that any new or increased parking or other program fees are implemented consistent with the Coastal Act and/or certified LCPs where applicable. CSP recognizes that LCPs establish requirements unique to specific locations and contexts. To address Coastal Act and LCP policies, and potential impacts to public access from new or increased fees, **CSP agrees to consider incorporating the following approaches in any proposed fee programs:***
  - 1) *Provide hourly rates at every facility where parking fees are charged. This will provide maximum flexibility for users, potentially create more turnover of visitors (especially at sunset), and may also increase revenue, as the recent experience in San Diego and Orange County suggests.*
  - 2) ***Consider supplemental means that increase visitation including extending park hours, parking lot hours and operations.***
  - 3) ***Reduce or eliminate fees during off-peak periods.***
  - 4) *Provide some areas within parking lots for short-term free parking for brief stops.*

- 5) *Limit the number of higher fee holidays per year, and include hourly holiday rates.*
- 6) *Expand and promote the sale of annual regional passes, and discount rates for seniors, the disabled, veterans and low-income persons.*
- 7) *Regulate hours and use of developed facilities, **but do not prohibit all access to public trust lands such as the shoreline.***
- 8) ***In areas where fees have not been charged historically, consider a phased approach for new fees, including limiting parking fees to a portion of the day (e.g., 9-5, 10-6, etc.) or week-ends only; consider free parking on certain days and a “first hour free”.***
- 9) *Consider whether in some cases the appropriate fee for a specific site may be no fee, for example where a state beach may be the only meaningful point of public access in a region, and/or those sites with minimal or no active management requirements or public facilities (such as facilities with no restrooms, campgrounds or visitor centers) and that can be “subsidized” by fee collection from the larger region.*
- 10) ***Address any closures or restrictions on actual access to and along the beach/shoreline that may be in place.***
- 11) ***The CCC acknowledges and appreciates CSP’s agreement to monitor and periodically review the implementation of any proposed fee programs, including assessing the impacts, if any, on coastal access, and annually report to the Commission available and relevant monitoring data and evaluation; including but not limited to: daily attendance, fee implementation (e.g. mode of fee), impacts to public access and other relevant data.*** (emphasis added)

DPR’s current proposal does not include any consideration of extension of park hours or parking lot hours and operations. The proposal does not include any plans to reduce or eliminate fees during off-peak periods, does not include a phased approach, and is not clear on current closed areas within the two state parks and whether or not these currently closed areas will be reopened. The proposal amounts to eliminating access to certain public trust lands unless users can pay for it due to the lack of alternative means of accessing the shoreline. The proposal does not reflect a commitment to work together with the Commission and local government as suggested in the 2013 letter from Dr. Lester. More importantly, the current proposal does not include a full response to the Commission’s identified informational needs.

The DPR March 21, 2016 submittal does not include baseline data on existing usage of affected parking lots and pullout areas (including those with proposed fees and those free areas that visitors who require or desire to avoid the fees might utilize). DPR submitted figures for paid day use and free day use in their parking lots within the two state parks as well as figures for

camping collected in fiscal years dating back to 2000/2001, but does not break those figures down per parking lot, and this does not include any information about available road pullout usage or other alternative parking area usage (like the County road area adjacent to Shell Beach). DPR did install traffic counters at North Salmon, Schoolhouse Beach, Bodega Head, Goat Rock and Willow Creek in May 2015, and installed additional counters in October 2015 at Portuguese Beach and Shell Beach. The installed traffic counters counted instances when a vehicle entered or exited the parking lot. There is no indication of whether or not the vehicle stayed or the length of stay. At least some of the counters were installed well after peak season usage as well. DPR did not fully evaluate expected changes in usage as requested by the Commission. In addition, DPR has not provided specific information as to how the collected fees would be spent in Sonoma to improve the two state parks in question. DPR states: “The increase in revenue received as a result of this program will make direct service enhancements such as improvements to bathrooms, parking lot improvements and facilities upgrades at these Parks possible, where currently these opportunities are limited.” DPR does not indicate whether all areas currently closed and unavailable for public use within Sonoma will be re-opened and maintained as a result of this fee collection proposal, and does not propose a schedule of specific improvements to occur in these two parks as a result of the imposition of a fee system. With respect to impact analysis, DPR concludes that their proposal is consistent with the Coastal Act, but provides no alternatives analysis. DPR maintains that any impacts to environmentally sensitive habitat areas will be controlled by facility design, installation of barriers, surface treatments, area or facility closure, change in access locations or redirection of visitors to other areas, but does not identify how these impacts will be identified, how changes will be implemented and what type of permit approval might be necessary.

Specifically, with respect to Bodega Head and the two parking lots proposed for fee collection, DPR states there is an area of free parking along Westshore Road adjacent to Bodega Bay that will continue to remain free and may fill up before the two lots proposed for fees.

DPR admits the public will still seek out unpaved shoulders along the roads to avoid paying parking fees, and suggests that the Commission include a condition of approval requiring all visitors who choose to park at any point beyond the end of the County-maintained road (i.e., on State Parks’ property), to pay either an hourly or daily fee to park. DPR is suggesting that people who are not parking within their proposed fee lots be made to pay the same amount as if they were parking in the lots. DPR makes the same suggestion for Goat Rock. DPR suggests that everyone who chooses to park along the nearly two mile distance of Goat Rock Road, in addition to persons who choose to park within the four parking lots proposed as fee collection lots, be made to pay for hourly or daily parking. It is difficult to assess how such a condition could be justified or enforced. In other words, DPR is asking the Commission to implement a condition of approval that would require DPR charge anyone who enters Goat Rock and anyone who enters Bodega Head for parking, even if they have not actually parked in the lot, and as if they were being allowed to park in one of the 8 different lots proposed for fees.

With respect to Shell Beach, DPR maintains that the Shell Beach lot fills to capacity early, and visitors are already using road shoulders near the entry road to the parking area because the lot is full. Therefore, DPR states that a new fee system at Shell Beach will not induce any more people to park outside the day use parking area to avoid paying fees, because the shoulders near

Shell Beach contain “dense vegetation, roadside ditches or other topography that severely limits the ability for new shoulder parking creation.” Further the public is far more likely to park on County roads located adjacent to Shell Beach. These roads are already heavily used by the public, and DPR states that there are already social trails created by the public from these County road parking areas so no new impact will occur. DPR did not collect information concerning baseline usage of the County roads and the roadside. DPR did not coordinate with the County regarding their decision to institute a fee system at Shell Beach and what impact it might have on the existing County roads or on County law enforcement trying to keep usage of these roads safe. DPR has not submitted any evidence of coordination with Caltrans regarding road shoulder usage or road pullout usage. DPR has contacted the County Sheriff and the California Highway Patrol, but their submittal does not include the results of that contact. Because DPR has failed to submit information that speaks to the requests made by Commission staff in order to inform this CDP determination (specifically requests made on April 15, 2015, on October 27, 2015 and on March 4, 2016), the Commission cannot find DPR’s proposal to charge fees at locations within Sonoma Coast and Salt Point State Parks consistent with Section 30214 of the Act which requires public access policies take into account the need to regulate the time, place and manner of public access.

***Sections 30220 and 30221***

With respect to Sections 30220 and 30221 of the Act, the Commission finds that DPR’s proposal will limit the public’s ability to access coastal areas suited for water-oriented recreational activities that cannot be readily provided at inland water areas, and does not adequately protect oceanfront land suitable for recreational use. Further, the Commission finds the proposal to institute fees where fees have never been charged to conflict with the public’s ability to reach the coast for water oriented recreation.

***Sonoma County LCP Policies***

The LCP contains an Access Plan with specific policies for each location where the proposed fee collection devices would be installed under State Parks’ proposal. The LCP also contains a Recreation Plan which provides specific policies for a number of the locations at issue in this project. Within the LCP’s Access Plan, the policies for 3 of the locations where State Parks proposes to install fee collection devices include language that reads “No Change.”<sup>35</sup> The Commission finds that the County’s LCP could be interpreted such that no change constituting a reduction in access is allowed without an amendment to the LCP. This is the case for two reasons. First, the discussion of access plan criteria recognizes the limitations associated with access along the Sonoma Coast, and, given the constraints, acknowledges that “the Access Plan represents adequate access in Sonoma County” (pg. 62/V-6). Therefore, any reduction in access to the shoreline, as it is identified in the Access Plan, especially given the existing constraints as discussed in the previous sections, such as a reduction that could result because of the imposition of parking fees, could represent the diminishment of “adequate access.” Second, the Recreation Facilities section of the County LCP identifies and evaluates existing and potential coastal areas suitable for public and private recreation. The introduction to the Recreational Facilities section reads:

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<sup>35</sup> These locations include Stump Beach, the four Goat Rock lots, and Shell Beach.

*The objective of the Recreation section has been to identify and evaluate existing and potential coastal areas suitable for public and private recreation. The type and scale of such potential development has also been identified.*

Thus, if the type of potential development identified in the certified LCP does not include fee collection devices, then fee collection devices arguably are not permitted in the parking lots within the areas detailed in the certified LCP's Recreation Plan without an LCP amendment.

That being said, it is unclear that it was the intent of the LCP Access Plan and Recreational Facilities sections to identify all types of allowable future development in the areas described. The descriptions and policies contained in both are short and do not contain the level of detail that would be required to deal with all possible potential future development at coastal access points. An alternate interpretation of these policies is that their purpose was to identify priority actions that would result in the continued provision or enhancement of public access to the Sonoma County coast. Thus, "no change" could be read as strictly as it is understood in this instance, but "no change" could also mean that there was not an identified need to make any changes to public access at those locations at the time of drafting (e.g., installation of accessibility features, development of new facilities, acquisition of private land for the purpose of building a trail, etc.). The underlying LCP certification documents do not provide a clear or expressed intent in this regard, and thus the LCP can be understood in either way.

However, regardless of the certainty in determining the intent of the "no change" language, the recreation section of the LCP recognizes the existing danger and visual resource impacts associated with parking along Highway 1 and the need to design parking lots to accommodate summer visitor demand in close proximity to trailheads. The specific Access and Recreation Plan recommendations contained in the LCP for individual park units provide a means to guide development priorities for access facilities (such as parking lots) to in part, direct the distribution of parking facilities and reduce the parking of visitors to the coast along Highway 1. In addition, the more general LCP access and recreation policies require that parking facilities be designed to serve the planned intensity of recreation development and be located in visually screened areas. Similarly, LCP transportation policies require wide accessibility of public parking facilities at coastal beaches, mitigation of environmental and visual impacts in parking lot development and reduction of hazardous parking along Highway 1 and at turnouts.

The LCP also requires the protection of environmentally sensitive resource areas including dunes and coastal strands, wetlands, and coastal bluffs. The LCP includes specific policies which guide public access development in and around these sensitive resources in a manner that will limit impacts to these resources. LCP sensitive habitat policies prohibit off-road vehicle use and limit access routes to well defined footpaths and equestrian trails in sensitive coastal resource areas. Further, in wildlife nesting and breeding habitats of rare or sensitive species, access and recreation is further limited. The LCP also requires posting of trails to educate the public about the importance of limiting access routes to protect sensitive plant communities.

As further detailed in the Coastal Act policy findings above, the project as proposed has the potential to result in more frequent or increased use of unsafe road pullouts, more parking along Highway 1, could drive more users to free locations overburdening existing parking lots and

associated facilities which would result in consolidation of use of parking facilities to coastal beaches, and could potentially lead to the development of volunteer trails across sensitive habitat areas. All of these potential impacts would be inconsistent with the LCP access and recreation, transportation and sensitive habitat policies.

Information requested from DPR including data on existing usage of all parking lots with proposed fees and nearby free options (parking along Highway One, pullout areas, and available County subdivision roads), and a thorough evaluation of expected changes in usage of these areas if fees are instituted is essential for the Commission to find consistency with the Sonoma County LCP. Without an understanding of the potential impacts, mitigation measures cannot be designed in a way to effectively reduce these potential impacts to visual resources, traffic and environmentally sensitive habitat areas.

### ***Conclusion***

DPR's proposal is inconsistent with the Coastal Act's public access and recreation policies and with the certified LCP for Sonoma County, and thus is denied. At the same time, State Parks is an important and valuable partner with the Coastal Commission and plays a fundamental role in the provision of public coastal access and recreation opportunities both to the people of and visitors to the State. State Parks manages some one-quarter of the State's coastline and roughly half of the Sonoma County coast. In 1980, 91 percent of State Parks' budget came from the State General Fund, and in 2013, contributions from the General Fund accounted for 29 percent of the budget.<sup>36</sup> State Parks is therefore increasingly reliant upon other methods of revenue generation to fund its system statewide, including at coastal State parks. State Parks has received specific legislative and administrative direction in recent years to create new revenue streams to fund its operations and the management of its facilities. The Commission believes that a path forward for Parks is to address the funding dilemma from a statewide prospective as opposed to proposing fees location by location or County by County in the current fashion demonstrated by DPR in 2012, 2013 and 2014. The issue is a statewide issue, and it is better understood within a statewide context, wherein fees may make sense at certain locations and units, but not others, and local interests and partners are better factored into the equation, including in terms of potential shared management and parks development. A statewide perspective also helps to ensure that such a statewide program is equitable, includes transit alternatives in locations where fees are newly imposed, and allows DPR to further explore partnerships with interested local governments and nonprofits who wish to relieve DPR of its burden of maintaining facilities. This process would be consistent with the letter agreements exchanged in 2013 by the then executive directors of the Commission and State Parks, and with the direction given in Parks Forward, the internal reorganizing effort underway within the State Parks department.

DPR is currently developing and implementing a service-based budgeting program. This budgeting program will enable DPR to describe its agency organization in terms of programs and services along with associated budgeted costs. Once implemented, DPR will be able to present its agency budgetary needs as the sum of all defined services. Service-based budgeting will

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<sup>36</sup> Testimony of Mat Fuzie, State Parks Deputy Director of Operations, to the Sonoma County Board of Supervisors, June 18, 2013.

enable DPR to prioritize its services and service levels, to propose future budgets by describing the costs and benefits of current service levels, enhanced service levels, new services and service level reductions when revenue declines. DPR is also developing a new budget management system which will result in an improved revenue and expenditure tracking system designed to give complete and current financial data to be able to effectively allocate projected revenue and stay within budgeted expenditure limits.

The Commission applauds the Department of Parks and Recreation for their innovation and proactive measures to improve their agency, its budgetary process and its partnerships. The Commission would like to continue its work with the Department to assure that public access and recreational opportunities are adequately protected, enhanced and maximized whenever possible.

#### **E. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

DPR, acting as lead CEQA agency, found the proposed project to be exempt from CEQA requirements. In a Notice of Exemption issued February 22, 2012, DPR states:

*Installation consists of: excavation of holes (maximum 3' depth x 2' width), iron rangers set in concrete and signs posts set in crushed rock and backfilled with native soil.*

#### **EXEMPT STATUS:**

*Categorical Exemption Classes: 3, 4, and 11 Section: 15303, 15304, 15311*

#### **REASONS WHY PROJECT IS EXEMPT:**

*Project consists of construction and location of limited numbers of new, small facilities; minor public alterations in the condition of land and/or vegetation which do not involve the removal of healthy, mature, scenic trees except for forestry purposes; and construction or placement of minor structures accessory to (appurtenant to) existing facilities; included as "installation of signs" and "installation of fee collection devices" in the Department of Parks and Recreation's list of exempt activities in accordance with CCR.*

DPR's 2012 Notice of Exemption included the current 8 locations proposed in the March 21, 2016 revised project. In the March 21, 2016 submittal, DPR further elaborates on its 2012 determination and states that under Section 15273 of the CEQA Guidelines, the imposition of fees is not considered a project under CEQA. Pursuant to Public Resources Code Section 21080(b)(8), DPR's proposal to establish the fees is exempt from CEQA because the fees are for the purpose of meeting operating expenses or to obtain funds for capital projects necessary to maintain services within existing service areas. DPR further states that many comments received by Sonoma County while the DPR CDP application was being considered pertained primarily to economic or social justice concerns, which may not be considered in determining whether the proposed project's physical change is significant. In summary, DPR has found the March 21st revised project consistent with CEQA and State Parks' CEQA implementation guidelines, and that the project as a whole is exempt from CEQA.

For the Commission, Section 13096 of the California Code of Regulations requires that a specific finding be made in conjunction with coastal development permit applications showing the application to be consistent with any applicable requirements of CEQA. Section 21090.5(d)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect that the activity may have on the environment. The Commission is denying the proposed development due to inconsistency with Coastal Act requirements regarding public access and recreation. CEQA does not apply to the Commission's disapproval of proposed development (Public Resources Code Section 21080(b)(5)).

**APPENDIX A: SUBSTANTIVE FILE DOCUMENTS**

- DPR March 21, 2016 submittal



# RECORD PACKET COPY

STATE OF CALIFORNIA—THE RESOURCES AGENCY

PETE WILSON, Governor

## CALIFORNIA COASTAL COMMISSION

CENTRAL COAST AREA OFFICE  
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Filed: 05/24/91  
49th Day: 07/12/91  
270th Day: 02/21/92  
Staff: L. Locklin/cm *L.L.*  
Hearing Date: 01/13-16/92 106p  
Commission action:



# M-3A

### STAFF REPORT: REGULAR HEARING

APPLICATION NO.: XS-91-12, -13, -14, and -16

APPLICANT: CALIFORNIA DEPARTMENT OF PARKS AND RECREATION

PROJECT LOCATION: Sonoma County: Sonoma Coast State Beaches: Russian Gulch (XS-91-12), Goat Rock (XS-91-13), Campbell Cove (XS-91-14); San Diego County: Carlsbad State Beach (XS-91-16)

PROJECT DESCRIPTION: Installation of four fee collection devices (2 mechanical park-ur-self and 2 non-mechanical iron rangers), and a portable kiosk, for the purpose of collecting parking fees.

LOCAL APPROVALS RECEIVED: None Needed

SUBSTANTIVE FILE DOCUMENTS: CEQA: Categorically exempt. [Class 3, Sec. 15303]

### SUMMARY OF STAFF RECOMMENDATION:

Based on previous Commission action regarding fee collection devices, staff recommends approval of the project.

### PERMIT PROCESSING

This staff report covers four permit applications; as they raise similar issues, staff has written only one report. However, the Commission must take four actions (one for each permit).

PROJECT PURPOSE

The purpose of this project is to develop the facilities needed to collect parking fees and to make fee collection more efficient in order to offset a \$16,000,000 reduction in the Department's operating budget for FY 1990/91, and \$8,000,000 reduction for FY 1991/92. This action is being undertaken pursuant to direction from the Legislature and the Governor.

The staff recommends that the Commission adopt the following Resolution:

I. Approval with Conditions.

The Commission hereby grants a permit, subject to the conditions below, for the proposed development on the grounds that the development will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

II. Standard Conditions. See Attached Exhibit A.

III. Special Conditions.

1. This permit shall be limited to the use of the fee collection devices for the purpose of collecting parking fees.

IV. Findings and Declarations.

The Commission hereby finds and declares:

1. Project Description

The proposed project is to install four fee collection devices, a portable kiosk, and signing at two developed State Parks units (see attached exhibits for the individual locations and site plans) for the purpose of collecting parking fees. Each device will generally be located near the entrance to the Park, in a previously paved or disturbed area. For the "park-ur-self" device, a trench will be dug to connect the electrical line. As grading for this trench will be done in previously disturbed areas, there will not be any adverse impacts upon coastal resources. Additional improvements proposed are signs for each device. The applicant has included as part of the project a program which will provide monitoring at each of the sites where new devices will be installed to identify adverse impacts that may result from the project. The applicant, as part of its existing statutory responsibility to protect the natural and cultural resources of the State Park system, is expected to perform necessary remedial action to perpetuate the resources in its care. This program also includes submittal of an annual report which details the impacts, if any, of the fee collection program and identifies necessary and appropriate mitigation measures.

## 2. Project History

On January 9, 1991 the Commission denied the Department's applications (XS-90-1 through -16) to install fee collection devices at sixteen State Park beaches based on a lack of information necessary to find the project consistent with the Coastal Act. On February 6, 1991 the Commission denied the Department's request for reconsideration of this decision. On May 24, 1991 the Department submitted new applications (XS-91-1 through -16) to install the fee collection devices. Pursuant to Commission regulation 14 Cal. Code Reg. Section 13109, an applicant ordinarily must wait six months after the denial of an application before resubmitting an application. This six-month waiting period may be waived if the Executive Director determines within five working days of the new application that the application is not "substantially the same" as the previous one. In addition, Section 13109 allows the Commission itself to waive the six-month limitation upon a showing of good cause. The Executive Director determined that the applications were not substantially the same as the Department's previous applications because the new applications contained significant new information bearing on the impacts of the fee collection devices. The Commission further found that good cause existed for waiving the six-month waiting period for the resubmittal of the applications because of the substantial public interest and legislative concern over the Department's plans to install the fee collection devices.

Of these 16 statewide proposals for fee collection devices (XS-91-1 through -16), seven were approved on June 11, 1991; five were approved on August 13, 1991, and four (the subject of this staff report) were continued from the August hearing. The reason that these four were continued, was to allow both the County of Sonoma and the City of Carlsbad time to discuss these projects with the Department. Over the last several months, meetings have been held between the Department and the local officials and a compromise has been worked out. In Sonoma, the County will reimburse the Department for the anticipated revenue until June 30, 1992; a new agreement must be negotiated beyond that date. In Carlsbad, the City has agreed to reimburse the Department for anticipated revenues from the date of Commission permit approval. Therefore, because there is no guarantee of renewed agreements and because the City's reimbursement is based upon the date of Commission action, the Department has requested that these last four projects be re-scheduled for Commission action.

## 3. Fee Collection Devices and Use Fees

Consistent with the mandate from the Legislature and the Governor and with the Department's bi-annual review of its fee schedule, the State Parks Commission held hearings, in September of 1990, and subsequently the Department's Director authorized the collection of fees and fee increases at park units throughout the State to cover the costs of operating and maintaining State Parks facilities. As a result of Commission action denying permits for the installation of fee collecting devices at coastal sites in January 1991, and due to public concern expressed over the cost of these new fees, the Department decided not to implement those fees until public meetings were held. Issues discussed at those meetings (which were held at 10 sites during

July 1991) included such items as: a) variable fees based upon the type of facilities and level of services provided at a park unit, b) variable fees based upon the time of year, c) hours of collection, d) are the fees consistent with comparable facility and service providers in the area, and e) other factors to help insure fairness and collection feasibility and efficiency. Public input from those meetings, coupled with the factors outlined above, have resulted in a different fee schedule, primarily based on level of service provided.

The Department has several existing programs which benefit low income, disabled, and elderly people. The Golden Bear pass costs \$5 annually, and is available to people meeting one of the following criteria: a) are at least 62 years of age and have a monthly income of less than \$630 per person, b) qualify for the AFDC (Aid For Dependent Children) program, c) are blind, d) are disabled, or e) qualify for the aid-to-the-aged program. The Limited Golden Bear pass (\$20 annually) is available to persons 62 years or older, and can be used after Labor Day until Memorial Day. Additionally, both disabled persons and disabled veterans qualify for an annual pass costing \$3.50 per year. Finally, an annual parking pass costs \$75.

The primary issue before the Commission is whether the installation and operation of the fee collection devices will adversely impact public access and/or other coastal resources. In it's approval of the other 12 devices, the Commission found that they would not adversely impact public access; these four devices are similar to those already approved and thus will not adversely impact public access. The main issue associated with the parking fee is possible attempts by the public to circumvent payment by such means as parking in adjacent free areas and walking over or through sensitive habitat areas to access the beach. As there is no charge for walk-ins, or bicyclists, there will not be any impacts associated with the walk-in or bicycle activity. The four locations proposed for the fee collection devices contain significant public improvements such as parking lots, restrooms, trash collection, trails and stairways. As discussed previously, the parking fee is commensurate with the facilities provided.

Installation and implementation of the fee collection devices may have some impacts on the pattern and level of public use. Certainly, any time new or increased fees are charged for use of an area historically available for free or at lower cost some former users will stop using the facility, use it less frequently, or find other means to get to that particular beach. Department experience has been that usage historically falls temporarily following such fee changes, but then returns to previous levels. At the same time, if the new fees are not collected and the Department's operating budget is not adequate to maintain needed levels of operation, some state park units (some of which may be coastal) may have to be closed. In the case of the latter eventuality, public access would clearly be adversely affected.

Because the Legislature has significantly reduced the Department's budget and has instead mandated new and increased user fees at all State park units where it is feasible to do so, the question of whether or not any new or increased fees should be imposed at all has been answered and is not within the purview of the Commission's jurisdiction in this case. Certainly the Commission can, at any time, by letter or resolution, urge the Legislature to reconsider the charging of new or increased fees at coastal parks. At this point, the Commission finds the fees to be commensurate with the services provided, in that there will not be adverse impacts on coastal resources. Future fee increases, however, could, depending on the increment, have such significant adverse impacts on coastal resources, including public access, as to warrant further Commission review.

No adverse impacts from the actual installation of the fee collection devices were identified at any of the sites. The Department will implement a monitoring program and will submit three annual reports to the Commission. These reports will identify and propose mitigation for any adverse impacts to natural resources and neighboring communities from the imposition of new fees. As proposed, the Commission finds that the installation of the fee collection devices is consistent with Coastal Act policies.

#### 4. Public Access

One of the most important goals of the Coastal Act is to protect, provide and enhance opportunities for public access to and along the coast. Section 30001.5(c) of the Coastal Act requires that public access and public recreational opportunities be maximized, consistent with sound resource conservation principles. Additional applicable Coastal Act policies are:

Section 30210 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30212.5 of the Coastal Act states:

Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, or overcrowding or overuse by the public of any single area.

Section 30213 of the Coastal Act states:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Neither the commission nor any regional commission shall either:  
(1) require that overnight room rentals be fixed at an amount certain for any privately owned and operated hotel, motel, or other similar visitor-serving facility located on either public or private lands; or  
(2) establish or approve any method for the identification of low or moderate-income persons for the purpose of determining eligibility for overnight room rentals in any such facilities.

Section 30214 of the Coastal Act states:

(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

- (1) Topographic and geologic site characteristics.
- (2) The capacity of the site to sustain use and at what level of intensity.
- (3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.
- (4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

(b) It is the intent of the Legislature that the public access policies of this article be carried out in a reasonable manner that considers the equities and that balances the rights of the individual property owner with the public's constitutional right of access pursuant to Section 4 of Article X of the California Constitution. Nothing in this section or any amendment thereto shall be construed as a limitation on the rights guaranteed to the public under Section 4 of Article X of the California Constitution.

(c) In carrying out the public access policies of this article, the commission, regional commissions, and any other responsible public agency shall consider and encourage the utilization of innovative access management techniques, including, but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.

Section 30221 of the Coastal Act states:

Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

Section 30252(4) and (6) of the Coastal Act states:

The location and amount of new development should maintain and enhance public access to the coast by ... (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, ... (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The above cited policies require that public access to and along the coast be protected, maintained, and enhanced. Other provisions of law require the Department to impose new fees at all State parks where it is feasible to do so. Currently, the Department manages 260 miles of California's coastline and through their mandated responsibilities is implementing and furthering Coastal Act policies by providing public facilities that enhance and make more accessible coastal recreational experiences. As discussed in the Department's submittal and above, the primary purpose underlying the installation of the fee collection devices is to obtain sufficient revenue to enable the Department to continue the maintenance and operation of all the State Park units along the coast for the enjoyment of people from throughout the State and Nation. Beyond the coast, the adequacy of revenues to defray Department operating costs is important for park units throughout the State as well. Under all the facts and circumstances present in this case, the Commission finds that these projects are consistent with Coastal Act goals and policies of providing public access to and along the shoreline.

##### 5. Sensitive Resources

Section 30240 requires the protection of environmentally sensitive habitat areas. It also requires that development adjacent to park and recreation areas be sited and designed to prevent impacts which would significantly degrade such areas and to be compatible with continuance of such habitat areas.

The Department has included a monitoring plan as a part of its submittal. This plan will monitor the effects of the new fee program and the Department will submit a report on the results of the program to the Commission on an annual basis for three years. At a minimum, the Department will identify where any new unauthorized trails have been established in order to avoid paying entrance fees. They will tabulate all letters and phone calls, and

will report complaints from the public and surrounding public officials (i.e., City police departments) relative to off-site adverse impacts. (The Commission acknowledges that there are a variety of other factors which may influence visitor usage, upon which the Department has no control.) The Department will then analyze this information and identify specific mitigation measures, such as installing fences and signs to prevent new trails which impact sensitive resources. The Department will also take whatever corrective action it deems appropriate and feasible as soon after an adverse impact has been identified as possible.

To address the issues related to the change of use and to identify environmental problems and mitigation measures, analysis of each location is detailed below:

a) Russian Gulch, Sonoma Coast State Beaches (XS-91-12)

Located within Sonoma County, this parking lot is located adjacent to Highway One. Facilities include picnic tables, fire rings, trash collection, vault toilets and a 40-car parking lot. There is limited shoulder parking along the highway, but access to the beach is limited to crossing the State Park lot as the brush and woods in the surrounding area effectively prevent unauthorized trails from being cut. To the north, is Fort Ross State Historic Park where day use fees are charged. To the south, there are several free pullouts with steep trails down to the beach. Charging of a fee at this beach may result in a change of public use for those people wishing to avoid a fee. However, they can travel south to use the pullouts, but services are not available at those locations. Thus, given the fact that there are alternative free areas and that trails will not be cut to avoid the fee areas, the Commission finds the development consistent with the public access and sensitive resource policies of the Coastal Act.

b) Goat Rock Beach, Sonoma Coast State Beaches (XS-91-13)

A narrow and windy one and a half mile long road leads down from Highway One to this parking lot. Facilities include a restroom, picnic tables, water, fire pits, toilets, 72 car parking lot, and trails to the beach. Users historically have parked some cars along the road, and accessed the beach by walking along the access road to the parking lots. There are no comparable areas to the north, and there are several parking lots and pullouts to the south that are currently free. While State Parks has an application pending at Sonoma County to install fee collection devices at many of these locations to the south, the County has not acted on this request and therefore it is unknown whether or not these beaches will be subject to fees in the future. Natural resources will not be damaged as trails to the beach already exist and alternative trails are not necessary to avoid the fee area. Therefore, the Commission finds the development consistent with the Coastal Act.

c) Campbell Cove, Sonoma Coast State Beaches (XS-91-14)

Located at the base of Bodega Head and adjacent to the Bodega Bay harbor entrance, this small pocket beach borders the harbor. Facilities include handicapped accessible toilets, five picnic tables, trash collection and a 20 car parking lot. The adjacent wetland area has been protected and enhanced, by the installation of fencing and a boardwalk. There are several trails, formal and informal, that lead across the terrace to other portions of Bodega Head. There are a large number of free parking areas along the road to the Head; trails link the road to the ocean (and South Salmon Creek Beach). Just north of the State Park facility, is West Side County Park, where a fee of \$3. is charged for day use. There are several alternative free areas for parking nearby and the adjacent County park offers similar services for a lower fee. In addition, there are several existing trails that do not create environmental degradation. For all the reasons cited above, the Commission finds that this project is consistent with the public access and resource protection policies of the Coastal Act.

d) Tamarack parking lot, Carlsbad State Beach (XS-91-16)

Located in the City of Carlsbad, this 60 car parking lot is adjacent to the Aqua Hedionda Lagoon inlet jetty. It is the only developed parking lot adjacent to the beach in the City. Pedestrian routes to the beach are well defined and there is no problem with use of unauthorized trails causing erosion. The State Beach comprises approximately one and a half miles of coastline. Facilities include a restroom with an outdoor shower, two acres of landscaping with picnic tables, six stairways, and two miles of pedestrian walkway adjacent to the beach. Nearby parking areas consist of free curbside parking along Pacific Coast Highway, as well as adjacent neighborhood and commercial streets. As discussed in the findings adopted for the Trestles parking lot (XS-91-15), there is and continues to be a conflict between out of area beach-goers and coastal residents. By incorporating the findings for XS-91-15, the Commission finds that installation of this fee collection device will not impact public access. In addition, the project is consistent with the resource protection policies of the Coastal Act.

6. CEQA.

The Department, as lead agency, determined that this activity is exempt from the requirements of the California Environmental Quality Act. The Commission finds that the installation of the fee collection devices is categorically exempt under CEQA regulation Section 15303, Class 3 (construction of small structures). The component of the Department's activity involving the establishment and approval of the fees themselves is statutorily exempt under Public Resources Code Section 21080(b)(10) and CEQA Regulation 15273(a)(1), because the fees are necessary in order to offset a \$16,000,000 reduction in the Department's operating budget for FY 1990/91 and an \$8,000,000 reduction for FY 1991/92. Furthermore, the project as conditioned will not create any significant adverse environmental impacts as defined by CEQA.

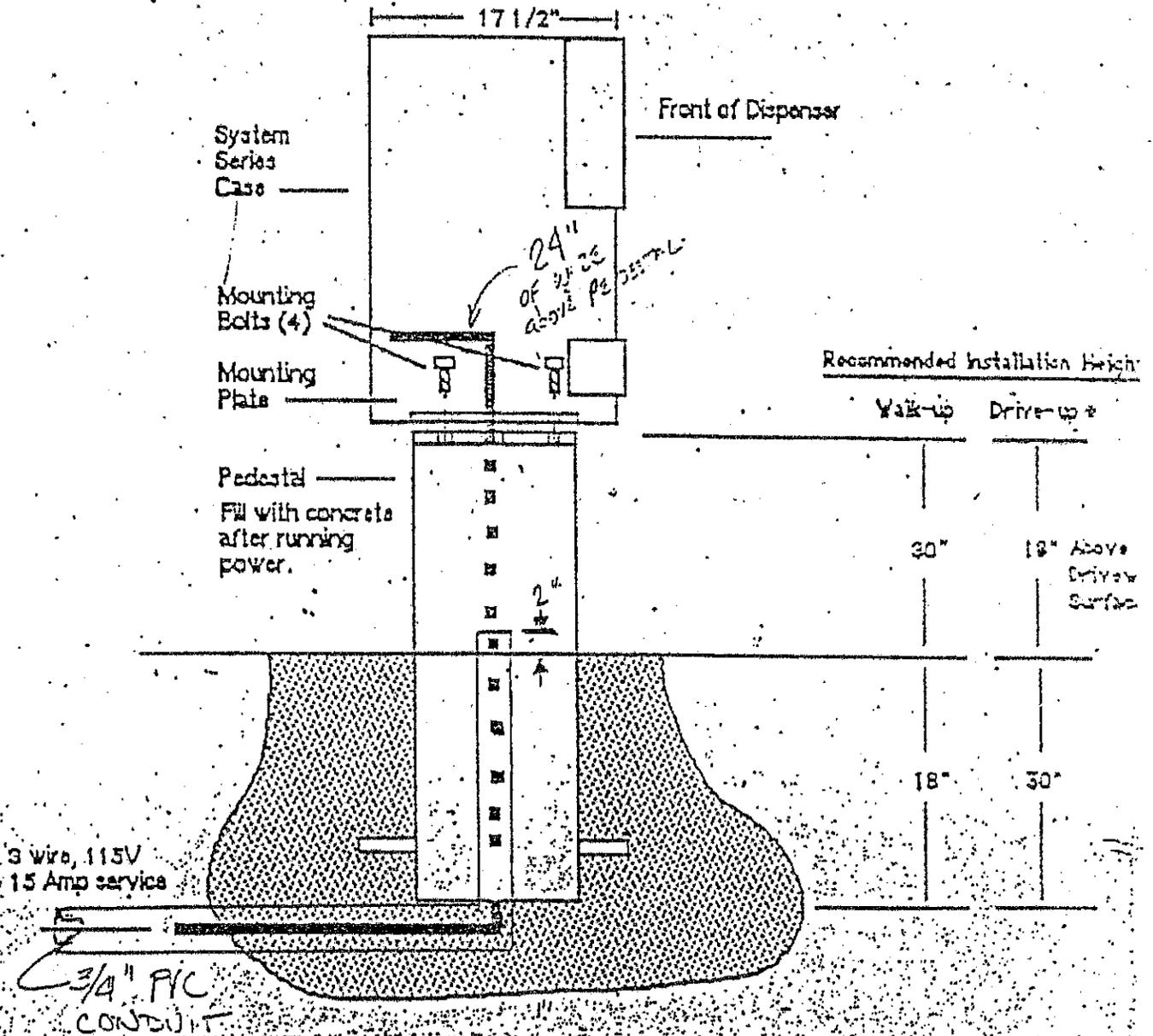
7. LCP.

These sites are located both within areas of the Commission's original jurisdiction within certified LCP's and in areas where the LCP has not been effectively certified. The standard of review is both the Coastal Act and the certified LCP. As discussed above, the projects are consistent with Chapter 3 of the Coastal Act. In addition, the pertinent sections of each LCP contain policies to protect natural resources and public access; as conditioned the projects are consistent with those LCP policies.

106p



# System Series™ Installation

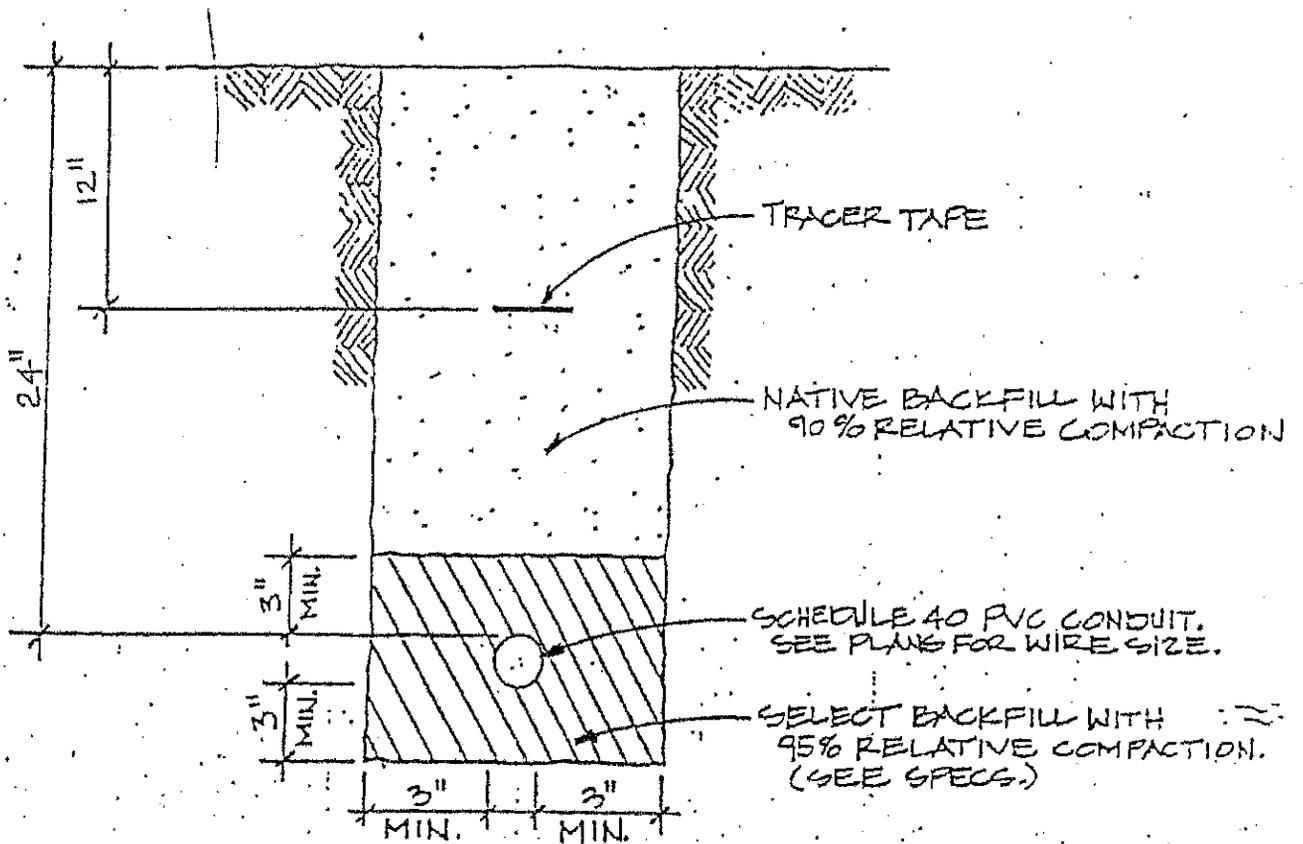


PEDESTAL SHOULD BE INSTALLED VERTICALLY ±3°

\*NOTE: Drive-up installation is not recommended for applications when heavy use during certain periods create line ups or in high volumes when tickets could be sold without spaces being available. Pre post are recommended to protect the equipment from being damaged by vehicles.

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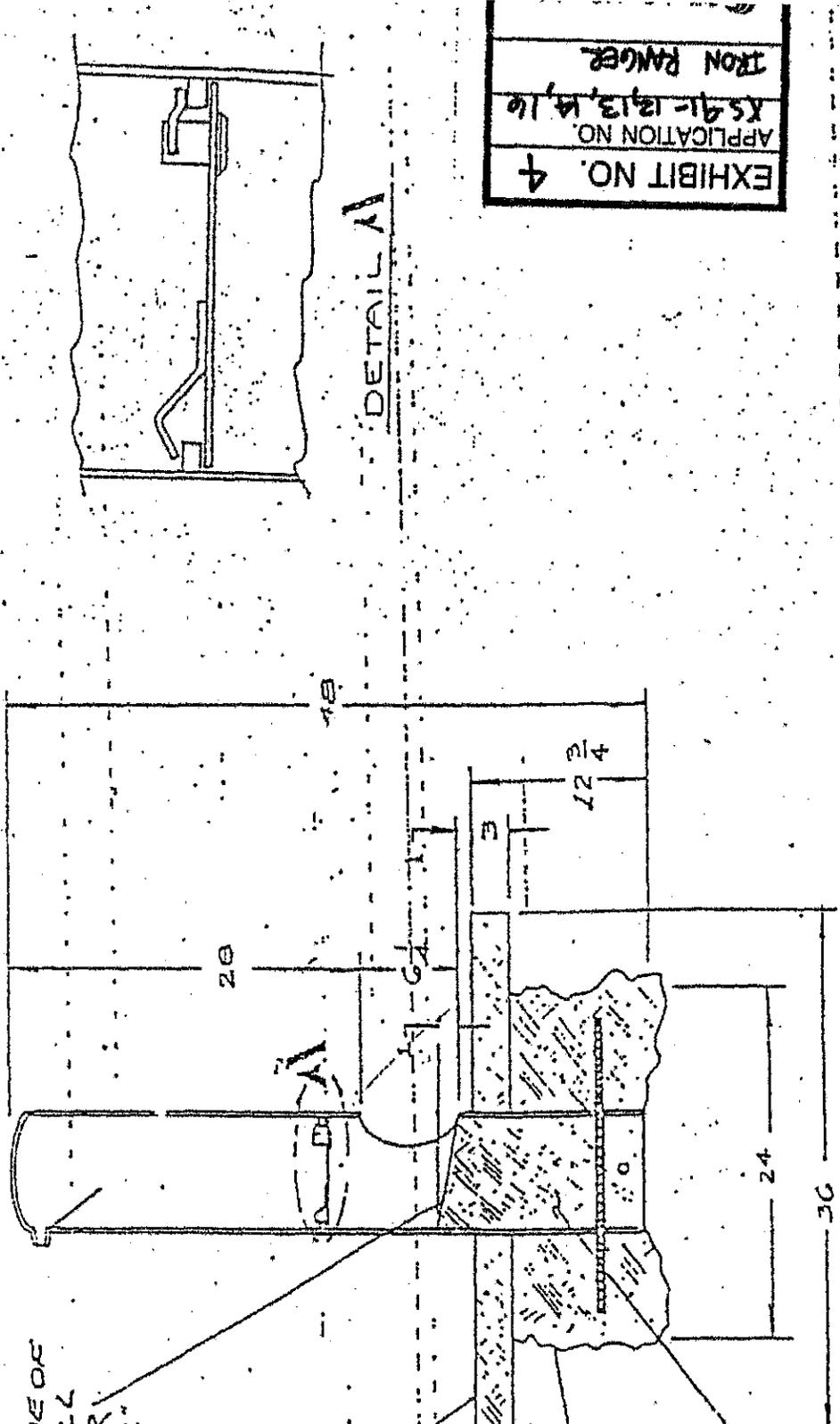
<b>EXHIBIT NO. 2</b>
APPLICATION NO. XS-97-SQ-12-19-2219 Exhibit 2
<b>PARK UR SELF</b> Expired CDPs Page 12 of 16



# ELECTRICAL TRENCH

NO SCALE

<b>EXHIBIT NO. 3</b>
APPLICATION NO. X5-91-12, 13, 216
Expired CDPs Page 13 of 24
PARK-UR-6515



NOTE: FILL INSIDE OF TUBE W/ CONC. TALL EVEN WITH DOOR LOWER LIP, W/ 1" SLOPE TO OTHER SIDE

36 X 26 8 X 3" CONG. PAD 2-25 CU. FT

3.1 CU. FT. CONCRETE

4.53 CU. FT. CONCRETE

EXHIBIT NO. 4  
APPLICATION NO. KS 91-1213, 14, 16  
IRON RANGER

CITY	NO.	TASK NUMBER	DESCRIPTION OF MATERIAL	UNIT
			HEFTY SHEET METAL	
NOTICE OF CONFIDENTIAL INFORMATION: This document and all information contained herein are the property of the FBI and are to be controlled and disseminated in accordance with the provisions of 28 CFR 16.104. It is to be controlled and disseminated in accordance with the provisions of 28 CFR 16.104. It is to be controlled and disseminated in accordance with the provisions of 28 CFR 16.104.				
			D-G25 DEPOSITORY	
			INSTALLATION LAYOUT	
			SCALE: 1/2" = 1'	
			DRAWING NO. B-300577	
			REV. DATE	

# PARKING RATES

**\$5.00 PER VEHICLE. USE COIN OR CURRENCY. VALID FOR PARKING ALL DAY AT ANY STATE OPERATED UNIT.**

Annual Pass, Disabled Veteran's Pass, Golden Bear Pass, Limited Use Golden Pass (not valid during peak season) are honored if displayed through the driver's side of windshield.

- **PARK CAR**
- **PURCHASE TICKET FROM DISPENSER**
- **PLACE FACE UP ON DASH AND LOCK CAR**

Vehicles and contents left at owner's risk. We do not take custody of vehicle but rent space only. Vehicles improperly parked and/or not displaying valid tickets will be cited.

OPERATED BY

EXHIBIT NO. 5

APPLICATION NO.

X5-91-12,13,14,16

A-2-SON-13-0219

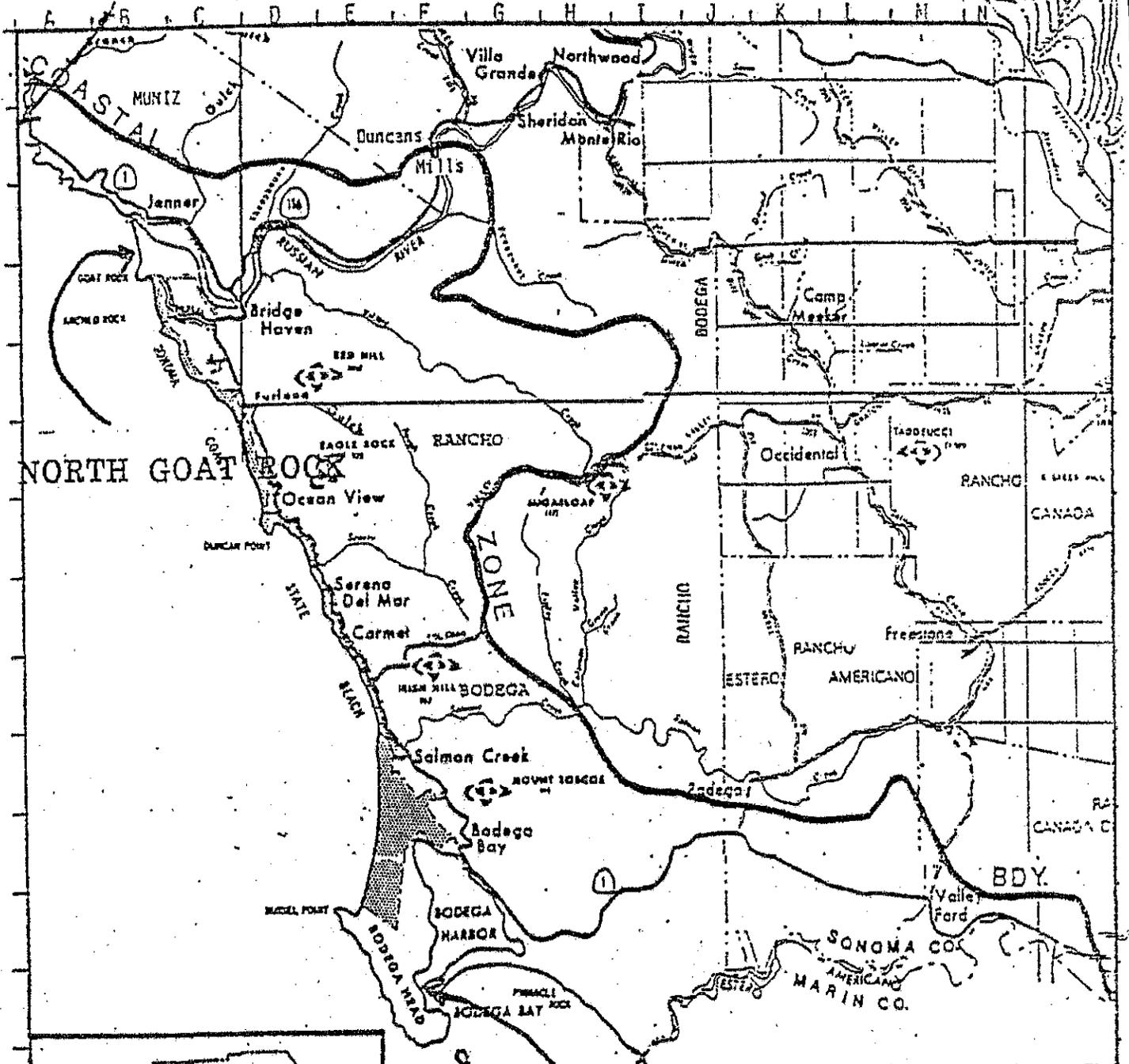
PROPOSED SCHEDULE

Expired CDPS

Page 15 of 24

California Coastal Commission

RUSSIAN GULCH



NORTH GOAT ROCK

CAMPBELL COVE

SONOMA COAST SB

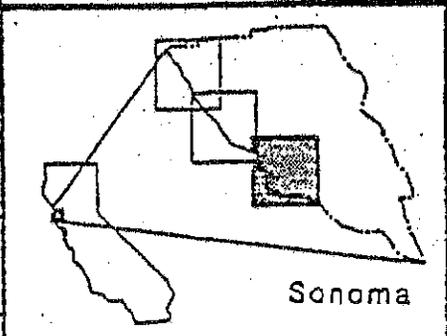
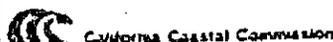
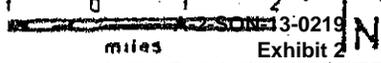


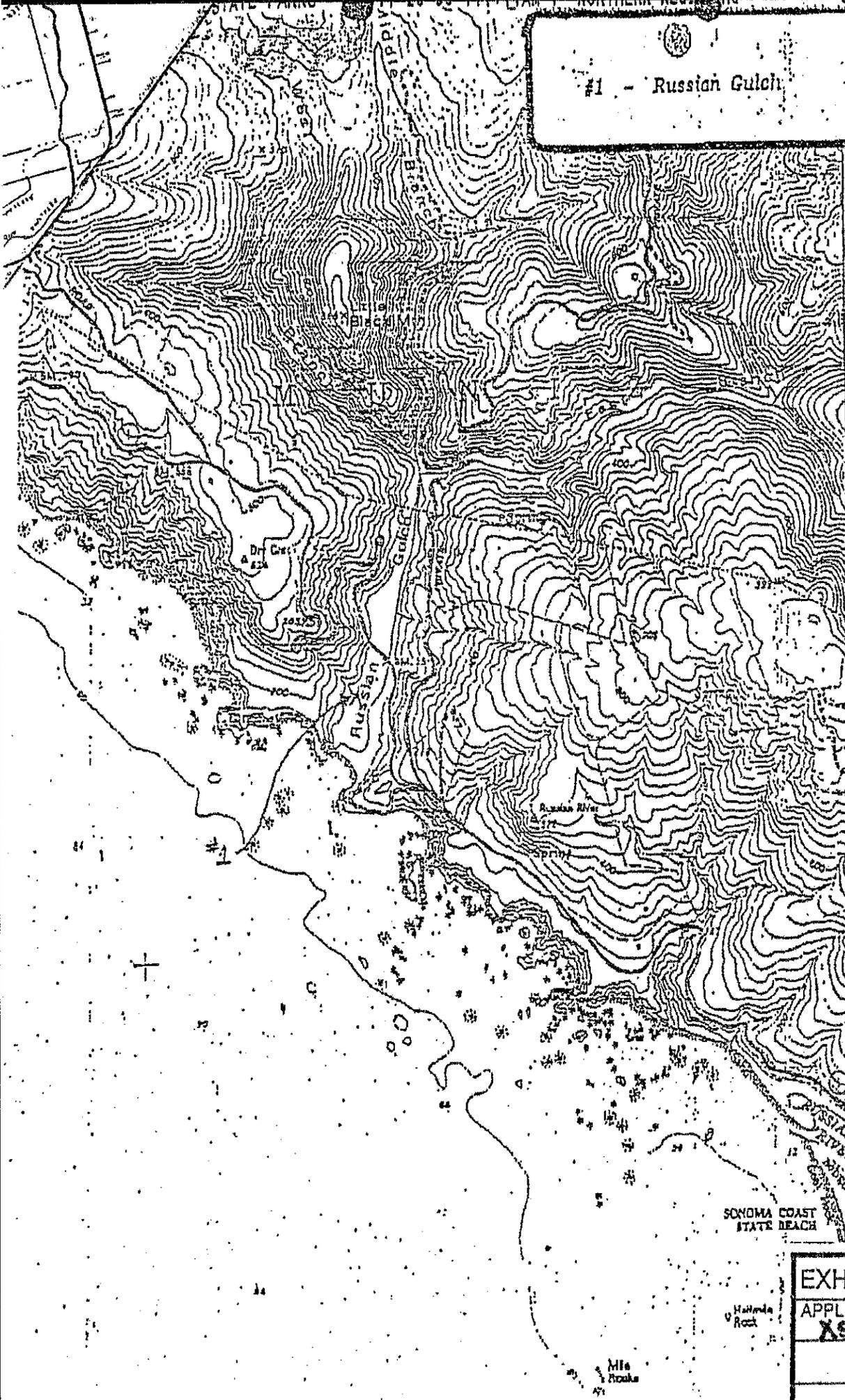
EXHIBIT NO. 6
APPLICATION NO. XS-91-12
XS-91-13
XS-91-14
California Coastal Commission



LOCATION MAP



#1 - Russian Gulch



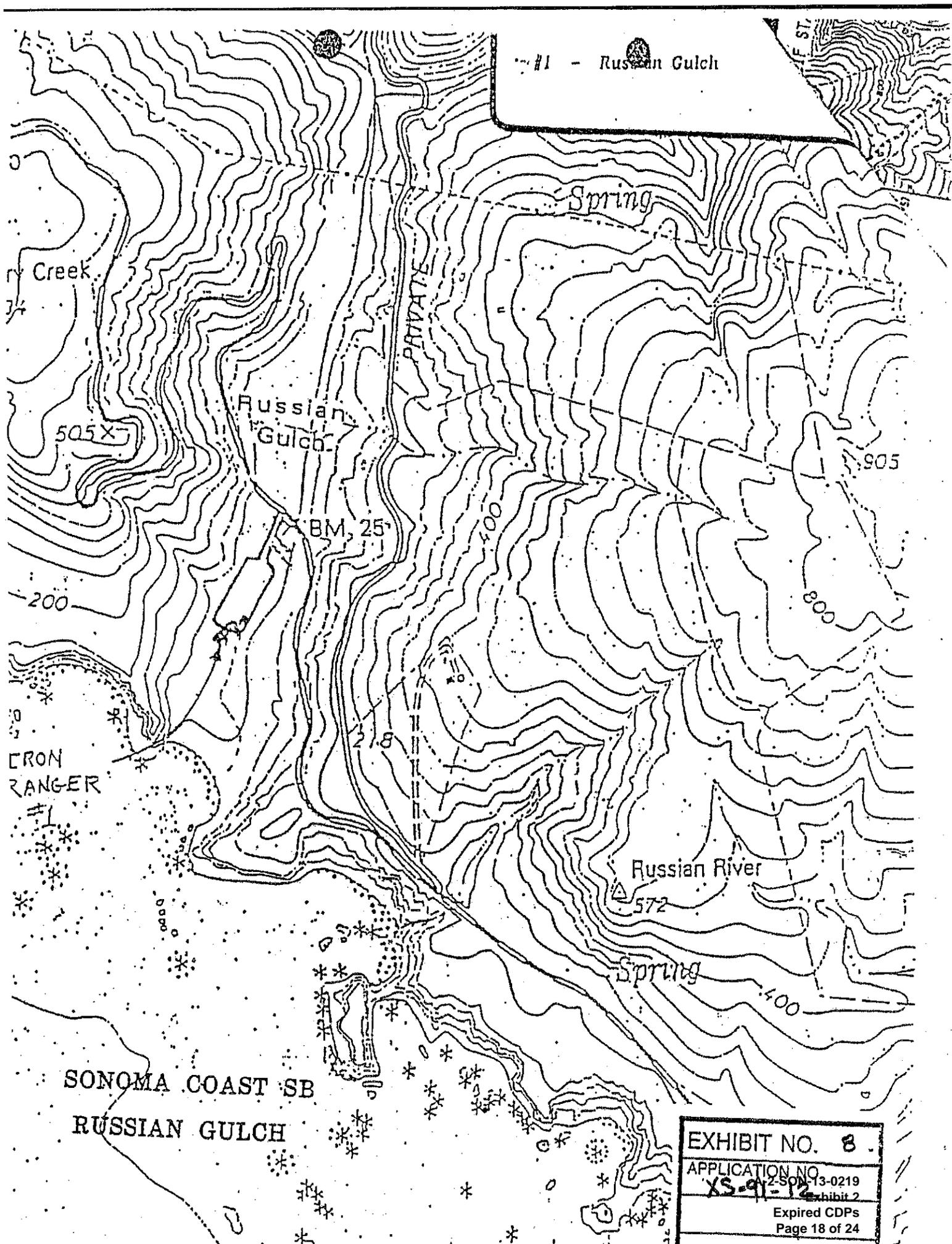
Vertical text on the right side of the map, including 'SONOMA COAST STATE BEACH' and 'RUSSIAN RIVER BEACH'. There are also numerical markers such as 100, 200, 300, 400, 500, 600, 700, 800, 900, 1000, 1100, 1200, 1300, 1400, 1500, 1600, 1700, 1800, 1900, 2000, 2100, 2200, 2300, 2400, 2500, 2600, 2700, 2800, 2900, 3000, 3100, 3200, 3300, 3400, 3500, 3600, 3700, 3800, 3900, 4000, 4100, 4200, 4300, 4400, 4500, 4600, 4700, 4800, 4900, 5000, 5100, 5200, 5300, 5400, 5500, 5600, 5700, 5800, 5900, 6000, 6100, 6200, 6300, 6400, 6500, 6600, 6700, 6800, 6900, 7000, 7100, 7200, 7300, 7400, 7500, 7600, 7700, 7800, 7900, 8000, 8100, 8200, 8300, 8400, 8500, 8600, 8700, 8800, 8900, 9000, 9100, 9200, 9300, 9400, 9500, 9600, 9700, 9800, 9900, 10000.

EXHIBIT NO. 7  
APPLICATION NO. XSA-97-120219  
Exhibit 2  
Expired CDPs  
Page 17 of 24

SONOMA COAST STATE BEACH

Malinda Rock

Mis Rocks



#1 - Russian Gulch

Spring

Russian Gulch

BM 25

Russian River

Spring

Creek

IRON RANGER

SONOMA COAST SB  
RUSSIAN GULCH

EXHIBIT NO. 8  
APPLICATION NO. 2-SPD-13-0219  
XS-91-12 Exhibit 2  
Expired CDPs  
Page 18 of 24

#2 - Goat Rock

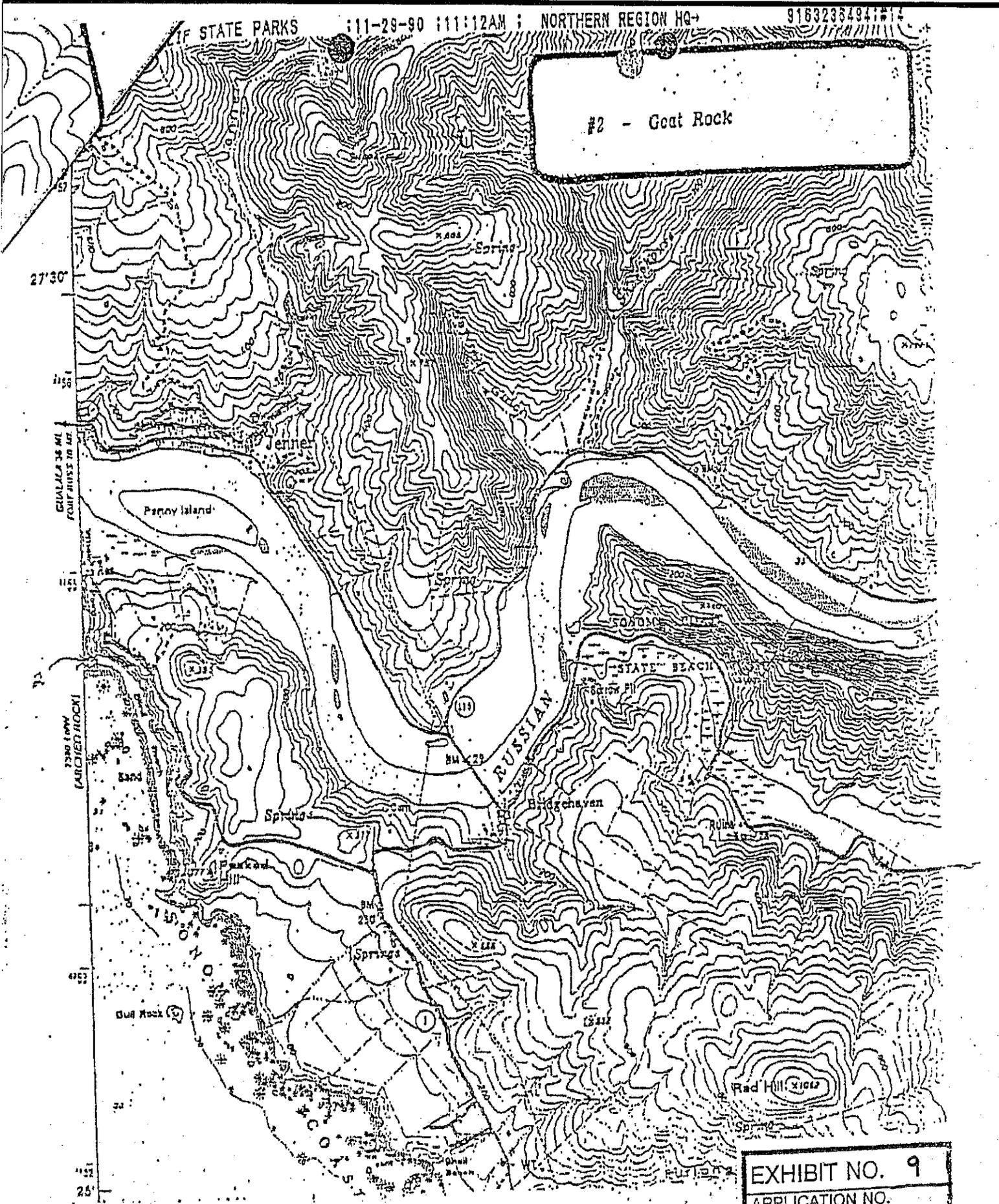


EXHIBIT NO. 9
APPLICATION NO. XS-91-13
A-2-SON-13-0219
Exhibit 2
Expired CDPs
Page 19 of 24
California Coastal Commission

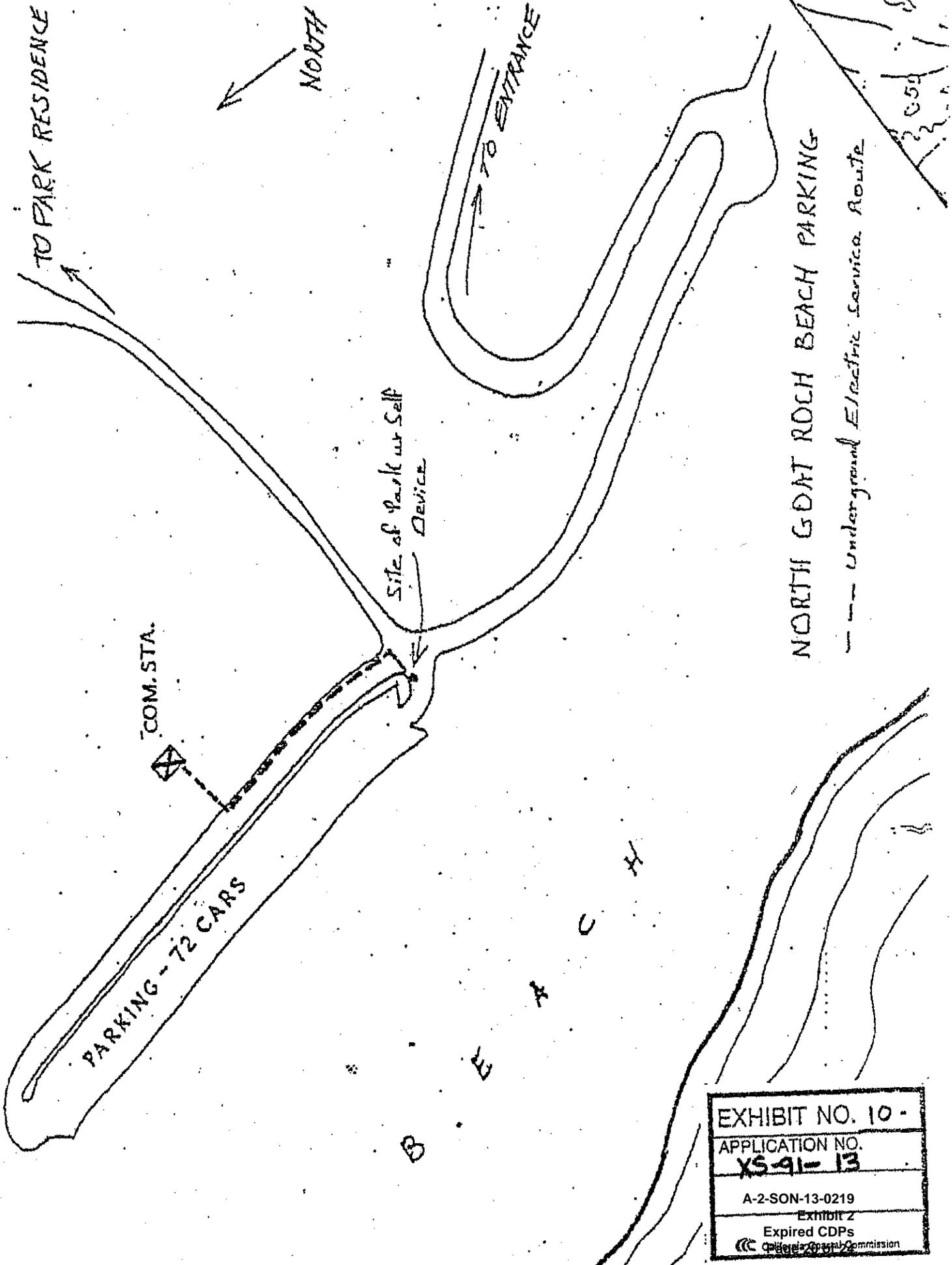
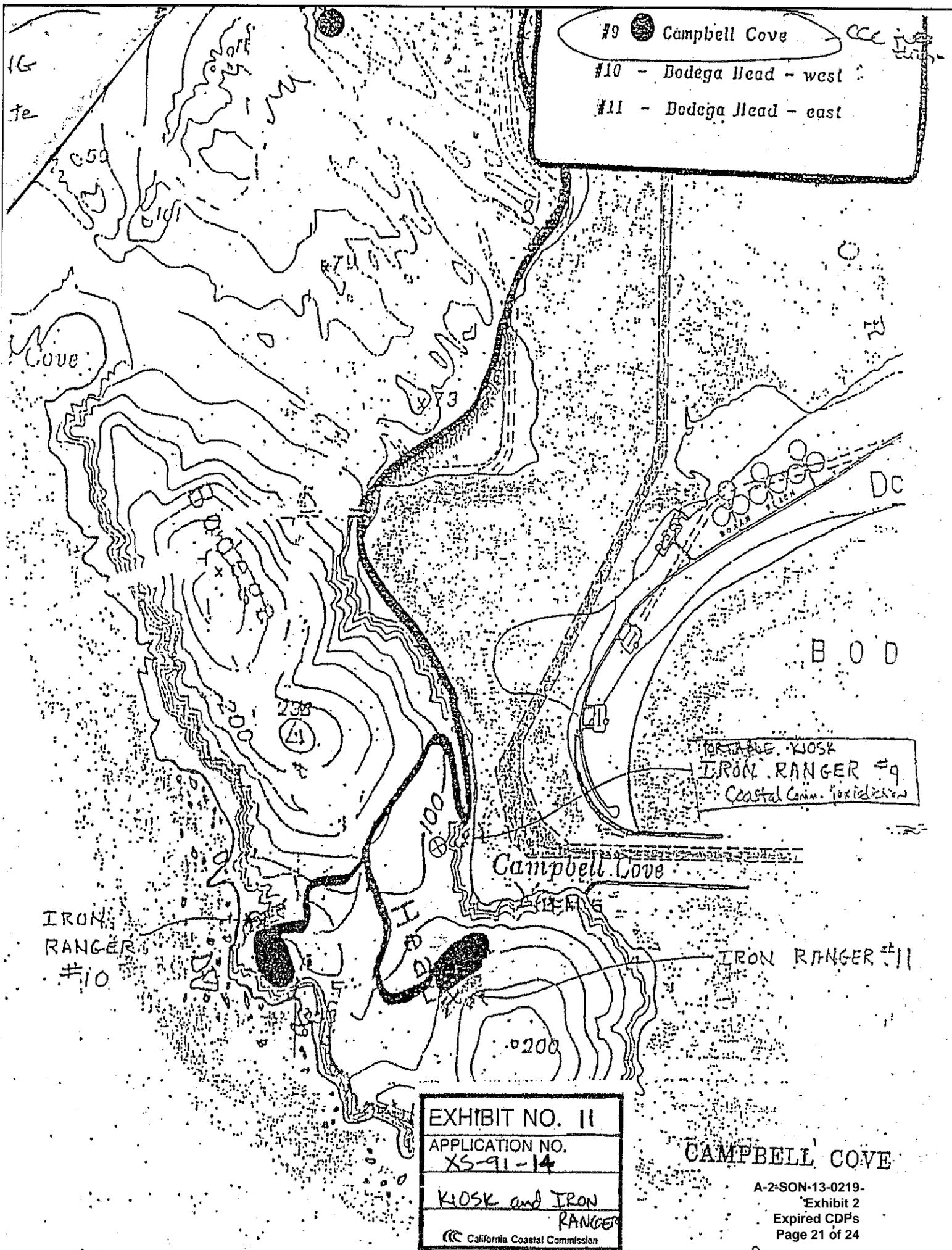


EXHIBIT NO. 10 -
APPLICATION NO.
<b>XS-91-13</b>
A-2-SON-13-0219
Exhibit 2
Expired CDPs
California Coastal Commission



- #9 ● Campbell Cove
- #10 - Bodega Head - west
- #11 - Bodega Head - east

PORTABLE KIOSK  
 IRON RANGER #9  
 Coastal Comm. jurisdiction

EXHIBIT NO. II  
 APPLICATION NO.  
 XS-91-14  
 KIOSK and IRON  
 RANGER  
 California Coastal Commission

CAMPBELL COVE

Campbell

\$2,000 cost

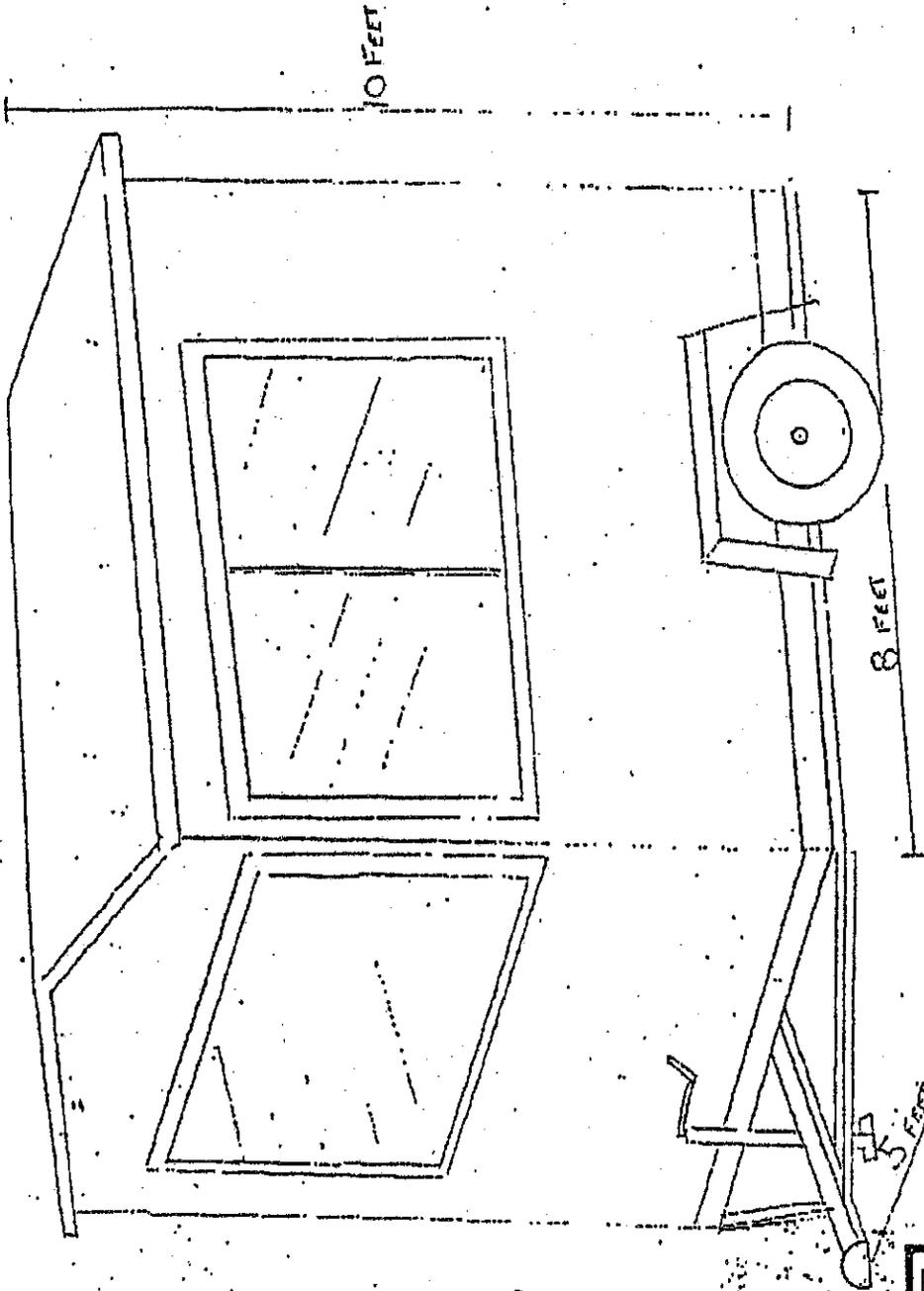


EXHIBIT NO. 12
APPLICATION NO. X5-91-14
A2-90M13-0219 Exhibit 2
Expired CDPs California State Commission

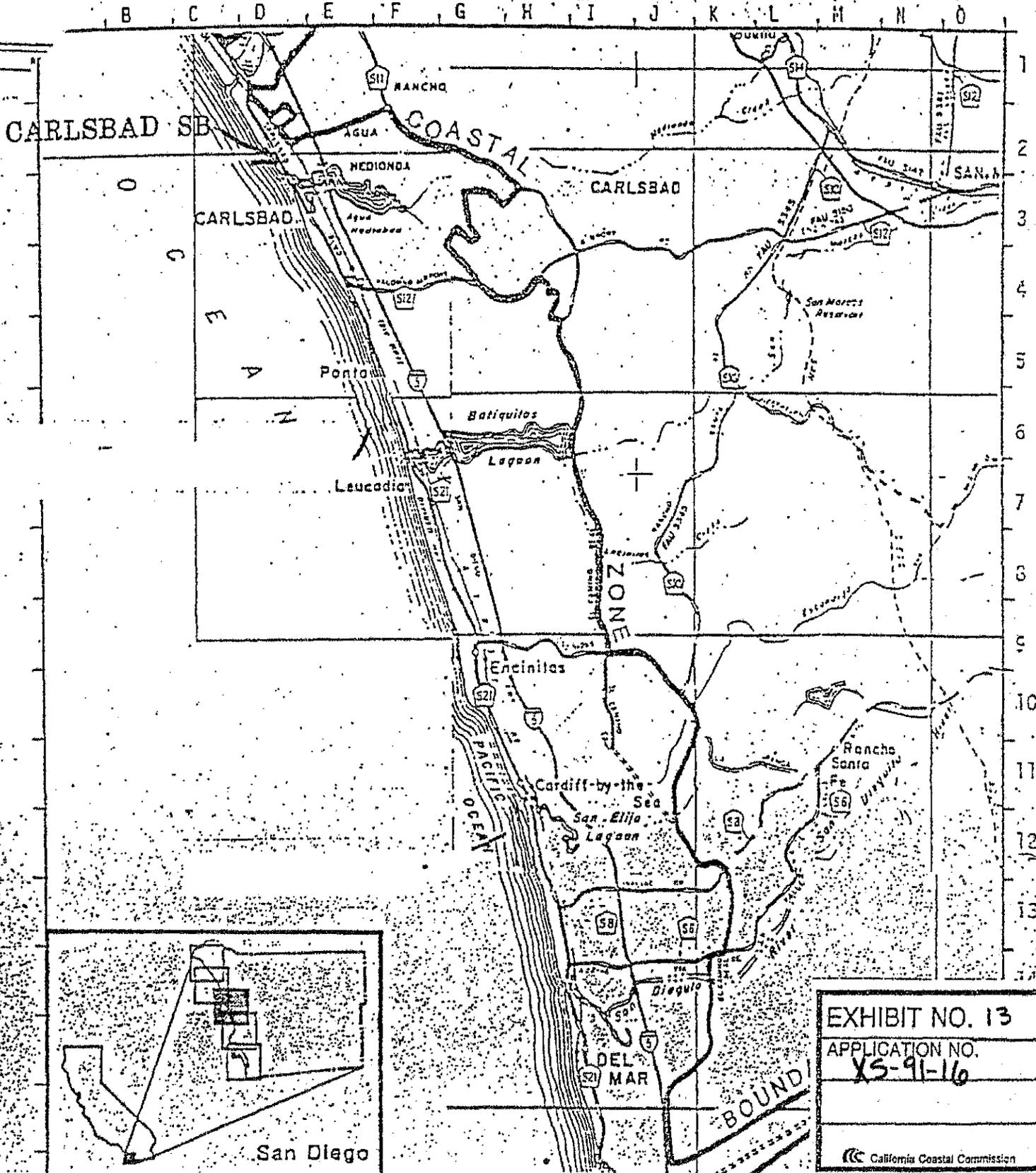
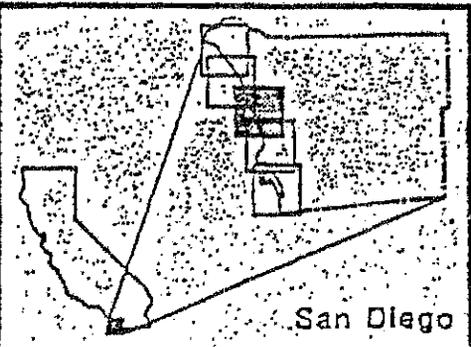


EXHIBIT NO. 13  
 APPLICATION NO.  
 XS-91-16

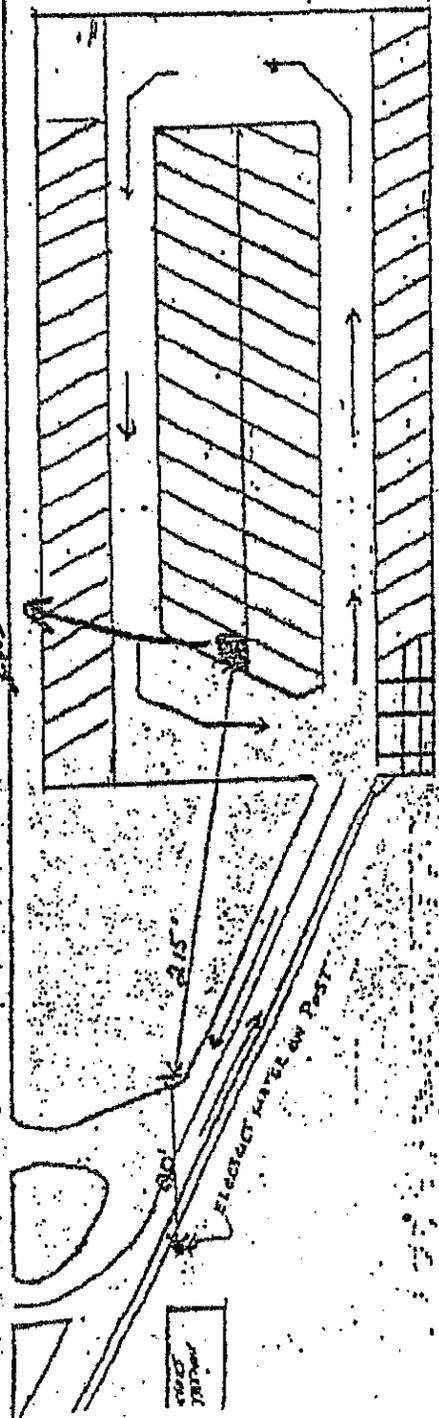
California Coastal Commission



CARLSBAD SB  
TAMARACK

Beach Blvd.

Installation Site



8-22-90 23  
TAMARACK LOWER LOT FRONT

SCALE: NOT TO SCALE

DATA

APPENDIX (6)

EXHIBIT NO. 14
APPLICATION NO. <b>X5-91-16</b>
A-2-SON-13-0219
Exhibit 2
Expired CDPs
Page 24 of 24





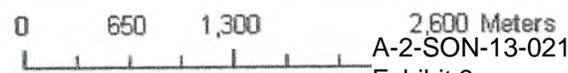
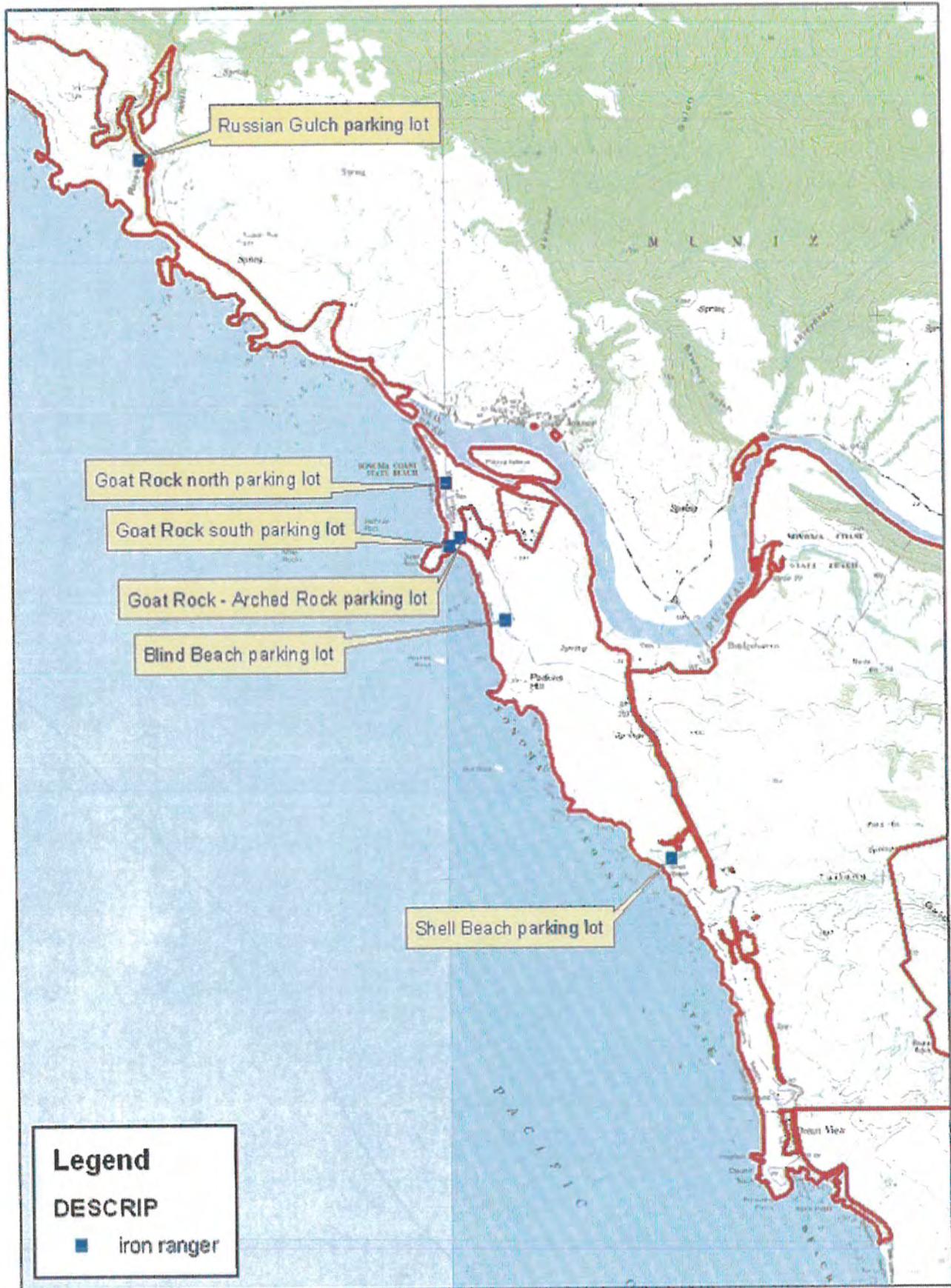
- Legend**
- Major Road
  - Paved Road
  - Trail
  - Paved Trail
  - Accessible Feature
  - Boat Launch
  - Campfire Center
  - Campground
  - Campsites
  - Environmental Camp
  - Hike/Bike Campground
  - Horse Trail
  - Locked Gate
  - Marina
  - No Drinking Water
  - Parking
  - Picnic Area
  - Flanger Station
  - Restrooms
  - RV Sanitation Station
  - Showers
  - Telephone
  - Viewpoint

**TRAIL MILEAGE**

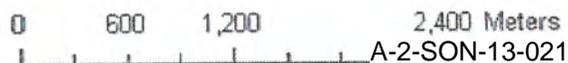
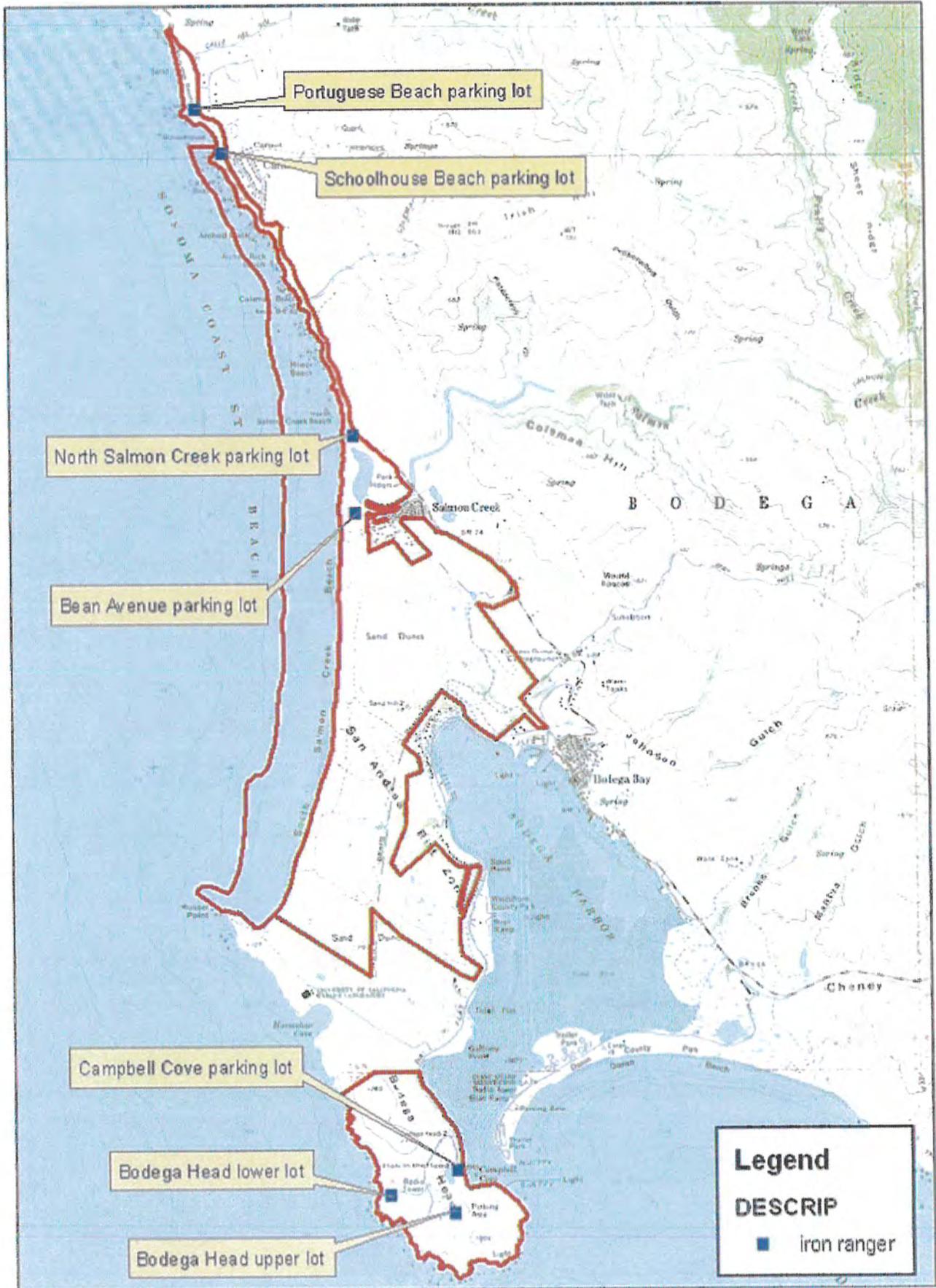
Goat Rock to Shell Beach	2.5 miles
Shell Beach to Wright's Beach	1.25 miles
Shell Beach - Pomo Canyon Trail	3.5 miles
Red Hill Trail Loop	1.25 miles

© 2008 California State Parks  
Map by Lucian Cartography, Salinas, CA

# Sonoma Coast North - Proposed Iron Ranger Locations



# Sonoma Coast South - Proposed Iron Ranger Locations



# FINAL NOTICE OF FINAL ACTION ON A COASTAL PERMIT ACTION NOTICE

Sonoma County Permit and Resource Management Department  
2550 Ventura Avenue, Santa Rosa, CA 95403  
(707) 565-1900 FAX (707) 565-1103

REFERENCE # 2-SON-13-0398

APPEAL PERIOD 6/25/13 - 7/9/13  
Date:

June 19, 2013

RECEIVED  
JUN 24 2013  
CALIFORNIA  
COASTAL COMMISSION

Applicant Name: California Department of Parks and Recreation  
Applicant Address: One Capital Mall, Suite 410  
Applicant City State and Zip: Sacramento, CA 95814

This notice is being distributed to the Coastal Commission and those who requested notice. The following project is located within the Coastal Zone. A project decision has been completed by the Sonoma County Board of Supervisors on June 18, 2013. The Board voted to deny the applicant's appeal and to deny the project.

File No.: CPH12-0004

Project Location: 14 locations on the Sonoma Coast, ranging from Stump Beach in Salt Point State Park to Bodega Head. The affected beaches include Stump Beach, Russian Gulch, Goat Rock, Blind Beach, Shell Beach, Portuguese Beach, Schoolhouse Beach, Salmon Creek (north lot and Bean Avenue), Campbell Cove, and Bodega Head upper and lower lots.

Assessor's Parcel Number: APNs: 109-030-006; 109-140-011; 099-040-002 & -004; 099-050-006; 099-060-001; 101-040-003; 101-110-004; 100-020-003; 100-010-007;

Project Description: The self-pay stations consist of an iron box approximately four feet above ground and one square foot in size placed in a hole approximately three feet deep and two feet in diameter on a concrete pad with bollards and with sufficient width and size to be accessible to someone in a wheelchair. The signs stating "DAY USE FEES SELF REGISTRATION" would be mounted to 4" by 4" redwood posts installed in crushed rock and backfilled with native soil.

The self pay stations and signs are proposed to be located in the already developed parking lots at the following locations. All sites are zoned PF CC – Public Facility, Coastal Combining zoning district. The site characteristics of each location, surrounding uses, and surrounding zoning are noted here also.

- 1 Stump Beach at Salt Point State Park—Gravel parking lot located 100 feet west of Highway 1, surrounded by forest. Existing bathroom onsite. PFCC-Public Facility, Coastal Combining. (APN109-030-006)
- 2 Russian Gulch—Gravel parking lot with gate, 200 feet west of Highway 1, screened by willows and riparian vegetation. Existing bathrooms are generally closed. LEA CC – Land Extensive Agriculture to the west and north and TP CC – Timber Preserve to the north. (AP
- 3 Goat Rock – Blind Beach
- 4 Goat Rock – South Lot
- 5 Goat Rock – North Lot (two locations)
- 6 Goat Rock – Arched Rock

The four parking lots at Goat Rock are all paved with asphalt and sometimes covered with sand. All locations except Arched Rock have bathrooms available. Blind Beach and Arched Rock lots are at the top of the cliffs; the "North" and "South" parking lots are at dune and

beach level. Nearby residential area overlooking the river mouth is zoned RR CC – Rural Residential. (APNS 99-040-002 & -004) **The North parking lot may be within the direct jurisdiction of the California Coastal Commission.**

- 7 Shell Beach—Asphalt parking lot 600 feet west of Highway 1, surrounded by coastal scrub with an old subdivision to the north. Site has bathrooms and trail to beach. All surrounding area, including area of three home sites, is zoned PF CC, same as the subject state parks property. (APN 99-060-001)
- 8 Portuguese Beach—asphalt parking lot just west of Highway 1, with bathroom and trail to beach. Surrounding area is PF CC to the north and south, with the Sereno del Mar subdivision, zoned RR-Rural Residential, to the east of Highway 1. (APN 101-110-004)
- 9 Schoolhouse Beach-- asphalt parking lot just west of Highway 1, with trail to beach. Surrounding area is PF CC to the north and south, with the Carmet subdivision, zoned RR-Rural Residential, to the east of Highway 1. (APN 101-040-003)
- 10 Salmon Creek North Lot
- 11 Salmon Creek South Lot – (Bean Avenue)

The two Salmon Creek parking lots are paved with asphalt and have bathrooms. The north lot is just off Highway 1. To the east is pasture owned by the Sonoma County Agricultural and Open Space District zoned PF CC. The Bean Avenue lot is a quarter-mile west of Highway 1. Surrounding zoning to the north and south is PF CC, and to the east is the Salmon Creek subdivision, zoned RR CC. **This site is governed by an existing Coastal Permit approved on appeal by the Coastal Commission, which may retain jurisdiction on this permit.** (APN 101-040-003 & 100-020-003)

- 12 Bodega Head – Campbell Cove Lot
- 13 Bodega Head – Upper Lot
- 14 Bodega Head Lower Lot

(Y) The upper parking lots have gravel parking lots, while the Campbell Cove lot has paving block surfaces. All lots have bathrooms. Surrounding area is coastal scrub, and the Campbell Cove site has the abandoned nuclear power plant trenching. All surrounding area is zoned PF CC. (APN 100-010-007) **The Campbell Cove parking lot may be within the direct jurisdiction of the California Coastal Commission.**

Proposed Project Denied by the Sonoma County Board of Supervisors on June 18, 2013.

Findings: The project, as described in the application does not conform with the plans, policies, requirements and standards of the Sonoma County Coastal Program. Specifically, The Board of Supervisors made the following findings to support the decision:

### Section 1. Application And Project.

1.1 The State of California Department of Parks and Recreation ("State Parks") filed Application CPH12-0004 with the Sonoma County Permit and Resource Management Department ("PRMD") on May 31, 2012, requesting a coastal development permit to install self-pay stations and fee

signage for the purpose of charging a new fee for parking at 14 locations on the Sonoma coast: Stump Beach in Salt Point State Park, and Russian Gulch, Goat Rock – Blind Beach, Goat Rock – South Lot, Goat Rock – North Lot, Goat Rock – Arched Rock, Shell Beach, Portuguese Beach, Schoolhouse Beach, Salmon Creek – North Lot, Salmon Creek – South Lot (Bean Avenue), Campbell Cove, Bodega Head – Upper Lot, And Bodega Head – Lower Lot in Sonoma Coast State Park; APNs 109-030-006, 109-140-011, 099-040-002, 099-040-004, 099-050-006, 099-060-001, 101-110-004, 101-040-003, 100-020-003, and 100-010-007; zoned PF (Public Facilities), CC (Coastal Combining); Supervisorial District No. 5.

## **Section 2. Procedural History.**

2.1 Prior to submitting Application CPH12-0004, State Parks determined that it would act as lead agency for the Project for the purposes of the California Environmental Quality Act ("CEQA"). As lead agency, State Parks determined that the Project was exempt from CEQA pursuant to State CEQA Guidelines sections 15303 (New Construction or Conversion of Small Structures), 15304 (Minor Alterations to Land), and 15311 (Accessory Structures), and prepared and filed a notice of exemption for the Project with the Office of Planning and Research on February 22, 2012.

2.2 After PRMD staff set the Project for public hearing before the Sonoma County Board of Zoning Adjustments ("the Board of Zoning Adjustments"), PRMD staff prepared a staff report analyzing the Project, discussing Project issues, and recommending denial of the Project. The staff report was distributed to the Board of Zoning Adjustments and made available to State Parks and the public in accordance with applicable law.

2.3 The Sonoma County Board of Zoning Adjustments ("the Board of Zoning Adjustments") conducted a duly noticed public hearing on the Project on January 17, 2013. At the hearing, the Board of Zoning Adjustments heard and received all relevant testimony and evidence presented orally or in writing regarding the Project. All interested persons were given the opportunity to hear and be heard. At the conclusion of public testimony, the Board of Zoning Adjustments closed the hearing, discussed the Project, and denied the Project on a 5-0 vote.

2.4 Within the time and in the manner prescribed by law, State Parks appealed the decision of the Board of Zoning Adjustments denying the Project to the Board ("the Appeal").

2.5 After the Clerk of the Board set the Appeal and the Project for public hearing before the Board, PRMD staff prepared a staff memorandum discussing the issues raised at the Board of Zoning Adjustments hearing and recommending denial of the Appeal and the Project. Attached to the staff memorandum was the staff report for the Board of Zoning Adjustments and other relevant documents. The staff memorandum was distributed to the Board and made available to State Parks and the public in accordance with applicable law.

2.6 The Board conducted a duly noticed public hearing on the Appeal and the Project on April 9, 2013. At the hearing, the Board heard and received all relevant oral and written testimony and evidence presented or filed regarding the Appeal and the Project. All interested persons were given the opportunity to hear and be heard. At the conclusion of public testimony, the Board closed the hearing, discussed the Appeal and the Project, and determined to deny the Appeal and the Project on the grounds specified herein.

2.7 The Board has had an opportunity to review this resolution and hereby finds that it accurately sets forth the intentions of the Board regarding the Appeal and the Project.

2.8 The Board's decisions herein are based upon the testimony and evidence presented to the County orally or in writing prior to the close of the Board hearing ("the record of these proceedings"). By Board Rule, any information submitted after the close of the Board hearing was deemed late and not considered by the Board.

**Section 3.  
CEQA Compliance.**

3.1 The Board finds and determines that for the purposes of CEQA, State Parks is the lead agency for the Project and the County is a responsible agency.

3.2 Because the Board is denying the Project, the Board finds and determines that the Project is exempt from CEQA pursuant to State CEQA Guidelines section 15270(a), and that the Board does not need to consider whether the Project is exempt from CEQA pursuant to State CEQA Guidelines sections 15303 (New Construction or Conversion of Small Structures), 15304 (Minor Alterations to Land), and 15311 (Accessory Structures), as determined by State Parks.

**Section 4.  
Coastal Act and Local Coastal Plan Conformity**

4.1 The Board concurs with PRMD staff's determination that the Project requires a coastal development permit pursuant to the California Coastal Act (Government Code section 30000 et seq.) ("the Coastal Act"), and that no exemption from the permit requirement applies. The Board further concurs with PRMD staff's determination that the County is the issuing agency for the required coastal development permit.

4.2 The Board finds and determines that the Project is not in conformity with the public access policies of Chapter 3 of the Coastal Act (commencing with Section 30200), and that the Board therefore cannot make the conformity finding required by Section 30604(c), for the following reasons.

(a) Article X, section 4 of the California Constitution ensures that "access to the navigable waters of this State shall be always attainable for the people thereof." Section 30210 of the Coastal Act states that in carrying out this constitutional requirement, "maximum access . . . shall be provided for all people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse." Section 30210 places four limitations on the requirement to provide maximum access to the coast: public safety, protection of public rights, protection of private property rights, and protection of natural resource areas. Further, Section 30214 of the Coastal Act provides that limitations on maximum access should be based upon the facts and circumstances of each case, including topography and geologic site characteristics, capacity of the site to sustain use and at what level of intensity, fragility of natural resources in the area, proximity to residential areas, protection of private property privacy, and protection of aesthetic values by providing for collection of litter. All of these factors concern site limitations and problems. Neither Section 30210 nor Section 30214 lists revenue generation as a basis to limit maximum access. The Board therefore finds that revenue generation alone is not sufficient justification to limit maximum access to the coast. One or more of the factors listed in Sections 30210 and 30214 must also be present. The Board further finds that there has been no showing by State Parks that any of the factors listed in Sections 30210 and 30214 necessitate the Project and its associated new parking fees. In fact, the Project and its associated new parking fees may adversely impact one of the listed factors, public safety, by causing people to avoid the safe fee-entry parking lots and instead park along and scramble up and down the eroding and far more dangerous bluffs to reach the beaches. The Board therefore further finds that the Project and its associated new parking fees are inconsistent with the requirements of Sections 30210 and 30214.

(b) The Coastal Act provides in Section 30213 that, "Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. . . ." Unlike urban settings where public transit provides a viable alternative means of reaching the coast, that is not the case in Sonoma County because there is no viable daily bus service to the coast from inland Sonoma County. Therefore, as a practical matter, for people to reach the coast in Sonoma County requires the use of an

automobile. The parking fees that will result from the Project will be entirely new fees, not merely increased existing fees, and will be on top of the cost of the drive to the coast. The new fees will have the effect of eliminating existing lower cost visitor and recreation facilities (i.e., the existing free parking lots). The Board notes that despite requests by PRMD staff, State Parks has not submitted any data to show what effects the Project and its associated new parking fees would have on coastal access. In fact, State Parks has indicated to PRMD staff that no such data exists. Based on the record of these proceedings, the Board finds that the Project and its associated new parking fees will adversely affect the availability of lower cost visitor and recreation facilities and negatively impact access to and use of the beaches. The Board therefore finds that the Project and its associated new parking fees are inconsistent with the requirements of Section 30213.

(c) The Coastal Act provides in Section 30240(b) that, "Development adjacent to . . . parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those . . . recreation areas." The Project and its associated new parking fees have the potential to cause the diversion of visitors from the new fee-entry parking lots to nearby free parking outside the lots. This could result in damage to sensitive natural resources as people create new trails to the beaches. State Parks has not presented a detailed plan for assessing and monitoring these potential impacts. The Board therefore finds that the Project and its associated new parking fees are inconsistent with the requirements of Section 30240(b).

4.3 The Board finds and determines that the Project is not in conformity with the Sonoma County Local Coastal Plan ("the LCP"), which was certified by the California Coastal Commission in 2001, for the following reasons. The LCP contains an Access Plan delineating existing and proposed accessways for an overall coastal access system for the Sonoma coast. Among other items, the Access Plan includes a description and recommendations (i.e., policies) for each accessway. The Access Plan contains references to all of the sites included in the Project. In some cases, the references are specific. In other cases, the references are to the "Recreation Plan" in the LCP. The LCP specifies that no change is allowed to the parking and access at Stump Beach, Goat Rock – Blind Beach, Goat Rock – South Lot, Goat Rock – North Lot, Goat Rock – Arched Rock, Shell Beach, and Portuguese Beach. The LCP does not include specific prohibitions against changes to the parking and access at Russian Gulch, Schoolhouse Beach, Salmon Creek – North Lot, Salmon Creek – South Lot (Bean Avenue), Campbell Cove, Bodega Head – Upper Lot, and Bodega Head – Lower Lot. However, the LCP does not specifically discuss or authorize new fees at these locations. The Board therefore finds that the Project and its associated new parking fees are inconsistent with the LCP and that an LCP amendment would be required for the Project to proceed. The Board further finds that no such LCP amendment has been applied for by State Parks.

## **Section 5. Evidence In The Record.**

5.1 The findings and determinations set forth in this resolution are based upon the record of these proceedings. References to specific statutes, ordinances, regulations, reports, or documents in a finding or determination are not intended to identify those sources as the exclusive basis for the finding or determination.

**Now, Therefore, Be It Further Resolved**, based on the foregoing findings and determinations and the record of these proceedings, that the Board hereby declares and orders as follows:

1. The foregoing findings and determinations are true and correct, are supported by substantial evidence in the record, and are adopted as hereinabove set forth.
2. The Project is exempt from CEQA for purposes of denial, pursuant to State CEQA Guidelines section 15270(a).
3. The Appeal and the Project are denied.

4. The Clerk of the Board is designated as the custodian of the documents and other materials that constitute the record of the proceedings upon which the Board's decisions herein are based. These documents may be found at the office of the Clerk of the Board of Supervisors, 575 Administration Drive, Room 100A, Santa Rosa, CA 95403.

Project is Appealable. The decision of the Board of Supervisors is appealable to the State Coastal Commission within ten (10) working days.

Address:  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

If you have any questions, feel free to contact me at (707) 565-1924 or at David.Hardy@sonoma-county.org. Please refer to your file number (CPH12-0004) and site address when making inquiries.

Sincerely,

Signature on file

David Hardy  
Project Planner

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c: File No. CPH12-0004

# Appeal of Sonoma County Board of Supervisors Decision Denying California State Parks Application for Iron Rangers

## I. INTRODUCTION

On May 31, 2012, California State Parks (CSP) submitted an application to Sonoma County for a Coastal Development Permit (CDP) to install 14 self-pay station collection devices and necessary appurtenant signs at various sites within Salt Point and Sonoma Coast State Parks. On January 17, 2013, the Sonoma County Board of Zoning Adjustments (BZA) considered the pay-station project and denied CSP's application, on the basis that installation of the pay-stations is inconsistent with the 1976 Coastal Act, which encourages "maximum access" to coastal beaches. As a result of this finding, and based on additional reasons, the BZA found that the proposal was inconsistent with its certified local coastal development plan (LCP).

California State Parks appealed the Board of Zoning Adjustment's decision to the Sonoma County Board of Supervisors (Board) and on June 18, 2013 the Board denied the appeal of that decision, also on the premise that charging a fee would restrict the "maximum" access required per California Constitution Article X, Section 4 and Section 30210 of the 1975 California Coastal Act. CSP is appealing the Board's decision to the California Coastal Commission on the grounds that the proposed pay stations are both consistent with the County's LCP and on the basis that they are also consistent with the Coastal Act itself. The County's decision to deny CSP a permit based on its finding of reduced public access cannot reasonably be supported, and in fact is contradicted by its own revenue collection at beaches in the area. CSP submits there are Substantial Issues the Board failed to consider that have the potential to set a regional and potentially state-wide precedent, and CSP will demonstrate pay station installation will not result in damage to coastal resources, and will actually enhance public access to the coastline within Sonoma County, consistent with both the Coastal Act and the LCP. CSP will also demonstrate that the proposal retains affordable, low cost recreation, as well as free recreation, and that there is no public safety or environmental impacts associated with the proposal that are not present now, or cannot be reconciled with active management and monitoring as proposed.



## II. PROJECT DESCRIPTION

In the short time since CSP filed its original application, the available technology now employed has rapidly evolved and improved. Whereas the traditional fee collection stations were limited to a heavy metal cylinder planted in the ground, CSP now installs electronic self-pay stations or Automated Pay Parking Machines (APPM) at many of its busier parks, even in remote areas with limited infrastructure. APPMs are solar powered units which have Wi-Fi connectivity to allow for the purchase of day use access through the use of cash, debit, credit, and *Pay Pass* options. They are fully programmable, and can be modified to meet daily needs, allow for retrieval of data, and thus have the potential to provide for a more flexible and efficient rate

schedule. Users can add time using their smart phones in locations where cell phone service is available, and CSP can alternate rate schedules to ensure maximum access is promoted.

Each APPM will have four bollards and installed to protect the machine, as well as, ADA access, and signage to assist visitors with “Self-Pay” instructions. Signage is located on 6’ high x 2” diameter break-away galvanized pole secured and anchored with concrete. Signage typically measures no more than 28” in width and no more than 84” above finished grade.

With the use of APPMs CSP can offer a rate structure that can be set to accept both flat rate and hourly options from the visitor. The use of the machines and a flexible and reasonable rate structure effectively manages high demand parking areas by increasing turn-over allowing for an increase in access for all visitors to these unique coastal areas.

Initially CSP proposes identical rates at each of the 14 locations, using the following general rate structure:

<b>Flat all-day rate</b>	\$8
<b>Hourly</b>	Up to \$3
<b>15 minute “surf-check”/sunset spaces</b>	Free

CSP will provide a 15 minute “surf-check” or sunset window for free at all times. It should also be noted, if patrons pay for a flat all-day pass, it will be good for all day use areas within the Sonoma-Mendocino Coast District for that calendar day.

**III. Access Will Not Be Affected Over the Long-Term, and Will Likely be Improved**

Based on experience and ongoing data collection at other beach locations, charging a flat rate or adjusting hourly rates during peak days does not discourage access, and in some cases can improve it. Similarly, over time CSP has generally found that new fees only cause a temporary deterrence, and that over a short period baseline usage goes largely unchanged. Based on its unique expertise and its experience, CSP believes this would be the case here given the popularity of these beaches and the unique attributes they provide to their region. (See, *Surfrider Foundation v. California Coastal Commission* (1994) 26 Cal. App. 4th 151, reviewing evidence provided by CSP that fees generally only cause a temporary decline in use.) Additionally, flat fees and hourly rates combined can have the effect of producing more parking opportunity. For example, visitors will in some cases opt to select an hourly ticket that more accurately reflects their anticipated time at the beach, thus freeing up spaces for later users. Additionally, because of the popularity of these beaches, and the fact that CSP offers a host of choices for annual and use passes, CSP believes visitors will continue at minimum to visit in their present numbers. Moreover, as new revenue streams allow services to be enhanced (like restrooms, parking lots, and trails), visitors will be even more likely to come and enjoy these beaches, particularly where lack of facilities like bathrooms and other basic necessities are currently creating an unintended deterrent.

In addition to believing this day-use fee rate schedule will have only minimal impacts on usage, CSP provides a host of alternative payment options that will allow fair and maximized access.

For example, CSP offers an array of low or no-cost annual passes to certain eligible groups. Persons with permanent disabilities are eligible to purchase a lifetime pass for a nominal \$3.50 processing fee, which entitles the user to a 50% discount for vehicle day use, family camping, and boat use fees at California State Park operated units. The Distinguished Veteran Pass is free for certain honorably discharged war veterans and entitles the user to free day use, camping and boat use fees at all units of the State Park system. The Golden Bear Pass is available for a \$5 processing fee to any qualifying person receiving Supplemental Security Income (SSI) [CA State Welfare and Institutions Code § 12200]; any person receiving aid under the applicable aid codes in the CalWORKS Program, or any person 62 years of age or older with income limitations. The Golden Bear pass entitles the bearer and spouse or registered domestic partner entry to most California State Park operated units where vehicle day use fees are collected at no charge. CSP also offers the limited Golden Bear Pass for \$20 to any person aged 62 or older. This pass entitles the holder and spouse or registered domestic partner entry to most California State Park operated units during non-peak season where vehicle day use fees are collected at no charge. If a person does not qualify for one of these passes, CSP also offers the Golden Poppy pass at a cost of \$125 which provides entry into most Parks in the State Park system with the exception of Hearst Castle and the southern California beaches. CSP proposes to post information about the available pass options along with the “self-pay” instructions.

Finally, in addition to CSP’s decision to retain 41% of its spaces for free parking (see section V Current Baseline Usage), these Parks also boast significant adjacent or near adjacent informal free parking on the shoulder or in nearby county lands. Attached to this memorandum are pictures of all affected day use areas, and included are descriptions of where such informal free parking exists and is currently being used by patrons wishing to walk into the beach, or when overflow is necessary. In most cases habitat is not impacted by this use, as these are existing pull outs and non-paved dirt areas that are designed for additional ingress and egress, and as such, have been used for many years by cars and visitors for the purpose of parking. Where there are potential areas where visitors would have to walk through habitat that is not marked by a trail or road, this is noted, and will be dealt with in the mitigation area of this memorandum. Importantly, since use of these informal areas is already taking place to allow for overflow and off-area hiking, and in fact was identified in Sonoma’s LCP as existing public access points, there is no reason to think public safety issues will increase as a result of this change, which merely maintains the existing baseline.

#### **IV. CURRENT PARKING FEES CHARGED IN SONOMA**

The Sonoma-Mendocino Coast District currently provides day use parking at the rate of \$8 per day at 5 day use parking areas in Fort Ross State Park, 6 day use parking areas in Salt Point State Park and 2 day use parking areas at Sonoma Coast State Park. A day use pass is currently, and the proposed flat rate day use pass would be, valid for parking at any recognized day use area managed and operated by State Parks during the date of purchase and operational hours, which may vary by park unit.

## **V. CURRENT BASELINE USAGE**

The District does not track visitor attendance by day use parking area but does track overall visitor usage within each park unit, broken down between paid day use and free day use. Within Sonoma Coast State Park, existing paid day use represents approximately 14% of the overall parking but only approximately 1% of the visitor trips.

There are currently an estimated 2400 day use parking stalls within Sonoma County State Park, Fort Ross State Park and Salt Point State Park. These include paved, gravel and shoulder parking where visitors routinely park. Approximately 600 spaces in 13 day use parking areas are currently subject to a flat \$8 daily fee. Under CSP's proposal, an additional 814 spaces would be subject to fees leaving 41% of all day use parking spaces free for visitors.

As noted below, CSP proposes to provide available baseline data prior to operation of APPMs so that it can fully assess any impediment to access over time, and adjust accordingly.

## **VI. Monitoring Program Proposed by CSP to Ensure Access is Not Compromised**

To ensure that no reduction in public access results, CSP proposes to employ the following monitoring and mitigation programs:

1. Provide Data and analysis currently done to develop the DPR Annual Statistical Data Report;
2. Provide any available baseline data of park unit and day use area parking lot use prior to operation of the APPM's;
3. Provide daily attendance figures for each park unit where an APPM is installed;
4. Provide any available analysis of the relationship of use fees to park attendance and day use area visitation patterns including vacancy and/or turnover rates if available;
5. Provide available information regarding factors such as weather, water quality, water temperature, surf conditions, Etc. which may affect visitation patterns;
6. Provide any available data which demonstrates use of annual passes, senior/disabled or other discounts; and
7. Provide information or statistics on parking violations or citations issued in areas where APPMs are utilized.

CSP will use rangers, roving lifeguards and other district staff in the course of their normal patrols, to continually monitor any change in the pattern of parking, making note of hazardous parking conditions, volunteer trail creation, and any resulting resource damage.

## **VII. Environmental Mitigation and Monitoring**

CSP recognizes that there may be a few locations where patrons will elect to park informally and walk-in rather than pay a day use fee. In most instances, as described in the attachments, there will be no impacts because this is already happening and wide turn outs designed for ingress and egress are available. However, where there is any habitat that could be used as a makeshift trail, CSP will deploy its rangers to attempt to educate about not using these areas.

To protect the cultural and natural resources of the park units and deter an increase in voluntary trail use, CSP proposes the following monitoring plan:

1. CSP trained employees will monitor visitor parking behaviors, creation or development of new voluntary trails, or visible degradation of resources.
2. CSP will conduct annual evaluations of resource damage and any increase in voluntary trails and compare and record changes from current baseline conditions using aerial photography and mapping provided through the *California Coastal Records Project or other similar means*.
3. If necessary, CSP shall retain the ability to make adjustments in rate structures to respond to any impacts to resources.

### **VIII. Fees Will Improve Service**

In general, fees collected at State Parks are deposited in the State Parks and Recreation Fund (SPRF) which is available to the Department upon appropriation by the Legislature. While the Department cannot commit future Legislatures to specific appropriations, increased revenue generation would provide opportunities for the Department to request projects specific to Sonoma Coast for approval by the Legislature. Additionally, through the passage of AB 1478 (2012), Public Resources Code §5010.7 (a) requires the Department to set revenue targets annually for each District. Public Resources Code §5010.7 (d) states that any District which exceeds their individual revenue target is provided with 50% return of revenue collected above the established target and that revenue must be expended in the same district it was collected. PRC 5010.7(d) would allow 50% of revenues above target to be utilized to enhance visitor services and amenities which maintain or increase revenue generating opportunities, where currently these opportunities are limited.

The current revenue target for the Sonoma Mendocino Coast District is approximately \$3.1 million. Generally, revenue targets are set annually based on the average of the three prior years of revenue collected in the district plus an adjustment for inflation. Therefore, it is expected that by implementing a fee collection program, Sonoma Mendocino Coast District will have the ability to exceed their revenue target and realize an increase in revenue returned directly to the District.

The increase in revenue received as a result of this program will make direct service enhancements such as improvements to bathrooms, parking lot improvements, and facilities upgrades at these Parks possible, where currently these opportunities are limited.



**Bodega West Day Use Parking Area**

Bodega West Day Use Parking Area is located on Bodega Head at the Southern end of Sonoma Coast State Park. The area provides gravel parking for approximately 90 standard-sized vehicles, contains restrooms and serves as a trailhead for a trail that skirts the bluff to the south and a trail that traverses Bodega Head towards Campbell Cove to the east. Because of topographical limitations and its relative remoteness, the nearest area where visitors could park without paying is along the shoulder of Westshore Road approximately 1 mile from the comfort station. However, visitors park along the shoulders of the road near the parking area when this Bodega West Day Use parking area is full, which is not accounted for in the total parking count. Additionally, there are user created paths between this informal shoulder parking and the trails.



**Bodega East Day Use Parking Area**

Bodega East Day Use Parking Area is also located on Bodega Head at the terminus of Westshore Road at the Southern end of Sonoma Coast State Park. The area provides gravel parking for approximately 100 standard-size vehicles, contains restrooms and serves as a trailhead for the same trail that traverses Bodega Head. Existing informal parking occurs along the shoulder of Westshore Road where a user-created trail is used to access the bluffs.



**Campbell Cove Day Use Parking Area**

Campbell Cove Day Use Parking Area is also located on Bodega Head at the terminus of Westshore Road at the Southern end of Sonoma Coast State Park. The area contains parking for 25 standard-size vehicles along with restrooms, and serves as a trailhead for shoreline trails along the Cove. Existing informal parking routinely occurs outside the gates along the shoulder of Westshore Road.



**Bean Avenue/South Salmon Day Use Parking Area**

Bean Avenue/South Salmon Day Use Park Lot is located at the western terminus of Bean Avenue, a county-maintained road. It is a paved parking area that accommodates 35 standard vehicle spaces and a comfort station. Bean Avenue also provides primary access to a small residential subdivision and is relatively constrained to the south by residences and by the river on the north side. However, visitors do frequently park on the shoulder in the subdivision to access the beach though shoulder parking is prohibited on weekends, and cars could be ticketed and/or towed. If parking on the shoulders, visitors access the beach by walking on the road and thus, non-designated trails and resource impacts are not a significant issue.



**North Salmon Day Use Parking Area**

The North Salmon Day Use Parking Area is located immediately north of the Salmon Creek estuary and just off Coast Highway 1. It is a paved parking area that accommodates 35 standard vehicle spaces and a comfort station. Free shoulder parking for approximately 60 vehicles is located both north and south of the parking lot entrances and vertical access trails are used to access the large beach area and estuary.



**Schoolhouse Beach Day Use Parking Area**

The Schoolhouse Beach Day Use Parking Area is located on a bluff above the ocean, and just across the highway from a residential subdivision. It is a paved parking area that accommodates 77 standard-size vehicles, a comfort station and coastal access. Due to the steepness of the bluff, access is limited to the existing designated trail. There is very limited free shoulder parking along the highway parking in the vicinity of this site but visitors occasionally park along the subdivision roads during peak use times and walk across the highway.



#### **Portuguese Beach Day Use Parking Area**

Similar to Schoolhouse Beach Day Use Parking Area and just approximately 1,500 feet to the north, Portuguese Beach Day Use Parking Area is located on a bluff above the ocean, and just across the highway from a residential subdivision. It is a paved parking area that accommodates 75 standard-size vehicles, a comfort station and coastal access. Some non-designated trails exist between the parking area and the top of the rocky bluffs. There are 12 vehicle spaces approximately 600 feet north, but as with Schoolhouse Parking Area, visitors may park along the subdivision roads during peak use times.



#### **Shell Beach Day Use Parking Area**

The Shell Beach Day Use Parking Area is located in a relatively isolated area just south of the community of Jenner, and setback approximately 600 feet off from the highway. It is a paved parking area that accommodates 42 standard-size vehicles, a comfort station and coastal access, and serves as a trailhead for the popular Kortum Trail. Free parking for approximately 66 vehicles exists along county roads (mostly undeveloped subdivision) immediately north of this parking lot and there are non-designated trails between those parking areas and the Kortum Trail.



**Blind Beach Day Use Parking Area**

The Blind Beach Day Use Parking Area is located in a relatively isolated area just south of the community of Jenner. It is a paved parking area that accommodates 22 standard-size vehicles, a comfort station and coastal access, and serves as another trailhead for the popular Kortum Trail. There is very limited free parking for approximately 6 vehicles along Goat Rock Road, approximately 1,200 feet to the north. There is a non-designated trail that surfers use to access the southern-most cove.



#### **Arched View Day Use Parking Lot**

Arched View Parking Lot is located on a bluff overlooking Goat Rock. It is a paved parking area that accommodates 30 standard-size vehicles, provides coastal access, serves as another trailhead for the popular Kortum Trail, is a prime vista point and is used frequently by hang gliders. This Day Use Area contains no restroom facilities, although there are others located nearby. There is limited free parking along the park road below the bluff and just above the beach. Because of the steepness of the bluff, there are no non-designated trails in the area.



**North Goat Rock Day Use Parking Area**

The North Goat Rock Day Use Parking Area is located just above the beach where the Russian River meets the ocean. It is a paved parking area that accommodates 64 standard-size vehicles, a comfort station and coastal access. Because of its proximity to the beach, non-designated trails are not a significant issue in this area though user-created paths are present in the European beach grass dominated dunes between the parking area and the beach.



**South Goat Rock Day Use Parking Area**

South Goat Rock Day Use Parking Area is a large paved parking area capable of accommodating up to 110 vehicles, and contains both restrooms and coastal access. As with North Goat, free parking opportunities are very limited in this area. Because of its location on a narrow rocky isthmus between the mainland and Goat Rock, volunteer trails are not an issue in this vicinity.



**Russian Gulch Day Use Parking Area**

Russian Gulch Day Use Parking Area is a gravel parking area that accommodates approximately 50 standard-size vehicles. The area includes a restroom and designated trail access to the beach area below. During peak use times, vehicles can be found parked at and across from the entrance to the parking area as well as shoulder parking along the highway approximately 700' north and 1200' south of the entrance. Non-designated trails from the off-highway shoulder parking to the beach are not a significant issue due to the steep terrain and dense vegetation.



**Stump Beach Day Use Parking Area**

Stump Beach Day Use Area is located in an isolated area along the Coast Highway 1 in Salt Point State Park. It has a gravel surface capable of accommodating approximately 37 vehicles. It contains a picnic area, restrooms, coastal access and serves as a trailhead. Shoulder parking along the highway occurs across from the entrance and approximately ½ mile south of the entrance across an open terrace. Mushroom foraging is popular within this park and has created a dispersed network of paths. No significant non-designated trails occur in the vicinity.

**CALIFORNIA COASTAL COMMISSION**

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October 27, 2015

Brad Michalk  
Environmental Coordinator  
California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 410  
Sacramento, CA 95814

Dear Mr. Michalk:

I understand from Coastal Commission staff's discussions with you and other staff from State Parks at the Sonoma-Mendocino Coast District that progress has been made toward collecting the information required for the Commission to undertake its *de novo* review of the proposed fee program at Sonoma Coast and Salt Point State Parks. As you know, the Commission discussed these needs during the April 2014 hearing and adopted findings at that time regarding necessary information in that respect, and you and I and Ethan Lavine of my staff have had a series of discussions with you about the Commission's expectations and State Parks' efforts subsequent to that April hearing. We appreciate State Parks staff's efforts to gather this data and information, including because a full and thorough submittal by State Parks that is supported by such evidence will be an essential part of the analysis that will be necessary to understand the proposed project, and to bring this matter to hearing and resolution. To this end, and because we have not yet received the requested information, I am writing to make sure we are all on the same page and it is clear what we expect State Parks to submit, as we have discussed. As identified in the Commission's adopted findings for Appeal Number A-2-SON-13-0219 and as discussed by the Commission during the hearing, State Parks is going to provide the Commission with the following:

- Data on existing usage of the affected parking lots and pullout areas (including those with proposed fees, and those free areas that visitors who require or desire to avoid the fees might utilize).
- Evaluation of expected changes in usage of these parking lots and pullout areas if fees are instituted as proposed, and mitigations to address any potential reductions in access that might be engendered by the fees.
- To the extent possible given the provisions of State law, the proposed program for use of the additional anticipated additional revenue generated within the Sonoma-Mendocino Coast District as a result of the proposed fee collection, including how and where the revenues would be applied, including what percentage of collected fees would be spent within areas where collected and within Sonoma County coastal parks in general.

- To the extent possible, additional information regarding facility and amenity improvement proposed both short-term and long-term for Sonoma County coastal parks.
- Analysis of other impacts associated with changes in user trends, including cumulative impacts, with respect to ESHA, public safety, and ADA accessibility (including within parking lots).
- There may be additional information need areas that come out of State Parks' ongoing public outreach and coordination with the County and other stakeholders.
- The County (including the County Sheriff's office), Caltrans, and CHP should all be contacted and allowed to provide input on all of the above, and the submittal needs to make clear their comments on these issues.

As we have discussed, we are targeting an April Coastal Commission hearing in Santa Rosa (tentatively scheduled to take place between April 13th and 15th, 2016). It will be critical that we receive State Parks' submittal with sufficient advance time (i.e., at least two months prior to a hearing date) in order to be able to appropriately analyze the proposed project, to discuss potential project issues with State Parks, the County, and other interested parties, and to prepare a recommendation and staff report to present to the Commission. Of course, this information is also of particular importance to help inform State Parks' ongoing stakeholder and community outreach efforts, and thus the earlier that such information can be made available to help that process the better. In addition, we are in the process of trying to schedule meetings and field work with State Parks, the County, and our staff, including our Executive Director in late February, and this data and information will be key to facilitating thoughtful discussion. It would be unfortunate if the information is not available in time for those discussions. We are hopeful that it can help to identify important trends and indicators that can help shape a project that all parties can support. As always, Commission staff is ready to assist should you have any questions, and we look forward to receiving this critical information regarding the proposed fee program for the Sonoma Coast.

Sincerely,



Nancy Cave  
District Manager, North Central Coast District

Cc: Liz McGuirk, DPR Chief Deputy Director  
Mike Lair, Sonoma-Mendocino Coast District  
Brendan O'Neil, Sonoma-Mendocino Coast District

---

**From:** Carl, Dan@Coastal  
**Sent:** Friday, March 04, 2016 10:10 AM  
**To:** Mangat, Lisa@Parks  
**Cc:** Lair, Mike@Parks; O'Neil, Brendan@Parks; Knapp, Karl@Parks; Michalk, Brad@Parks; Ainsworth, John@Coastal; Cave, Nancy@Coastal  
**Subject:** State Parks Sonoma County fee program project  
**Attachments:** Informational Needs for State Parks Sonoma Appeal 3.4.2016.docx

Hi Lisa et al,

As discussed at our meeting earlier this week, I am forwarding you all the list of information needs for moving this project forward. This list includes those items identified by the Commission when they took jurisdiction last April (as also summarized in Nancy's October letter), as well as those emanating from the fact that Parks is proposing a revised and different project now, and those coming out of discussions with Parks, the County, and the public last week. We also identified some of the unsettled processing points that we discussed at our meeting and that we are still trying to work through. We tried think this through and to be as inclusive as possible so that we have it all out on the table. We welcome your thoughts and feedback on these items as well as others that your team may have come up with in support of the revised project. We really want to make sure we have asked and answered the questions as much as possible, including so we can find the best possible path and project moving forward. I understand that you and Jack will be talking later today about all of that as well. In the meantime, I hope this proves helpful. Thanks...

Dan

---

Dan Carl  
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Central Coast and North Central Coast Districts  
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how at [SaveOurWater.com](http://SaveOurWater.com) and [Drought.CA.gov](http://Drought.CA.gov)

**Information Needed to Properly Analyze State Parks Sonoma County Fee Program  
March 4, 2016**

**Coastal Commission information requirements adopted April 15, 2015 (also including minor changes identified in Staff's October 21, 2015 letter)**

- 1) Baseline data on existing usage of affected parking lots and pullout areas (including those with proposed fees, and those free areas that visitors who require or desire to avoid the fees might utilize).
- 2) Evaluation of expected changes in usage of these parking lots and pullout areas if fees are instituted as proposed, and mitigations to address any potential reductions in access that might be engendered by the fees.
- 3) To the extent possible given the provisions of State law, the proposed program for use of the additional anticipated revenue generated within the Sonoma-Mendocino Coast District as a result of the proposed fee collection, including how and where the revenues would be applied, including what percentage of collected fees would be spent within areas where collected and within Sonoma County coastal parks in general.
- 4) To the extent possible, additional information regarding facility and amenity improvements proposed both short-term and long-term for Sonoma County coastal parks.
- 5) Analysis of other impacts associated with changes in user trends, including cumulative impacts, with respect to ESHA, public safety, and ADA accessibility (including within parking lots).
- 6) Summary of comments and responses associated with State Parks' public outreach and coordination with the County and other stakeholders.
- 7) Input from the County (including the County Sheriff's office) Caltrans, and CHP on all of the above, including their position overall on the proposed project.

**Additional information needed (resulting from the revised project, our site visits and meetings with State Parks, the County and the public)**

- 8) Updated project description and supporting materials for the revised project, including site plans, elevations, materials palette and renderings/visual simulations for APMs, kiosks, and related development (e.g., signs and barriers, ADA parking facilities, etc.).
- 9) Completed CEQA document, including responses to comments received (note that CCC regulations require a copy or summary of the CEQA document, including responses to significant environmental points raised during the CEQA process (CCR Section 13057).
- 10) Information on budgeting and how revenues could be applied to Sonoma Coast in a simplified/easy to understand format (see also numbers 3 and 4 above).

- 11) Summary of DPR consultation with Native American representatives, including potential changes to address Native American concerns.
- 12) Summary of DPR consultations with specific user groups, including potential changes to address user group concerns. (User groups include but are not limited to rock climbers, hikers, mountain bikers, educational groups, at risk kids groups, clean up groups, seal colony protection groups, etc.).
- 13) Details associated with DPR's proposed oversight group, including its membership and how it would be designed to operate to inform DPR processes.
- 14) Information regarding proposed nighttime operations (e.g., will parks be closed at nights, and how will that be implemented and enforced if so).
- 15) Specific information on how the APMs and kiosks will work for credit/debit cards as well as cash and check, and the type of user data that will be collected by APMs and kiosks.
- 16) Details regarding proposed joint or shared management of Willow Creek facility (including details of shared responsibilities, finances, future improvements, etc.). Why is Willow Creek being included in this application?
- 17) Additional specificity on County and DPR pass programs, including low income passes, and the manner in which these programs can or will be integrated for Sonoma coast parks.
- 18) An evaluation of the potential to offset potential fee impacts through the use of some local free days; group passes for Native Americans, educational groups, at-risk kids, clean-up volunteers, marine mammal rescuers, etc.; etc.
- 19) Summary of DPR's fee programs by County to be able to understand how Sonoma County fits into the mix (e.g., are fees imposed at State coastal parks in Mendocino, Humboldt, and Del Norte? If so, please describe the fee programs there. If not, why are fees not being proposed there?).

### **Unsettled points**

- 20) The current project is much different than the project that went through the local process and was appealed. That project was for a series of metal tubes without consideration of a fee schedule, where it was implied that fees would be the next logical step at some point in the future. The current project is for kiosks, APMs, and related development, along with a fee program. There is a question as to whether the current project can be properly before the Commission in de novo review in this case, or whether it is so different as to need to go through a local CDP process.
- 21) If the current project can be properly before the Commission, the Willow Creek portion of the project was not before the County, nor before the Commission in the substantial issue hearing. There is a question as to whether the Willow Creek project can be properly before the Commission in de novo review in this case, or whether it is a new project that needs to go through a local CDP process. Such issues are compounded by fact that it includes County

land and has not received any sort of local approval (as is required for projects considered by the Commission).

- 22) If the current project can be properly before the Commission, the Campbell Cove portion of it is located in the Commission's retained permitting jurisdiction, and would require a separate CDP (or a consolidated CDP) from the Commission. It is not clear that such an application could be properly before the Commission as it would require evidence of local approval (and in case of consolidation, agreement by the County to use that process).

**CALIFORNIA COASTAL COMMISSION  
De NOVO APPLICATION  
BACKGROUND AND PROJECT DESCRIPTION**

**DAY USE PARKING FEE COLLECTION DEVICE PROPOSAL**

**March 2016**



**State of California  
California State Parks**

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## EXECUTIVE SUMMARY

The mission of California State Parks (“State Parks”) is to provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.

Along the Sonoma Coast, State Parks operates four park units totaling 19,408 acres with an annual visitation of over 3.8 million people. These parks stretch 31.5 miles along the coast and offer multiple locations for visitors to enjoy unspoiled Sonoma Coast vistas, wild beaches, forests, beach and river access and miles of trails. These locations also offer a variety of services from paved parking lots with restrooms, picnic sites, garbage collection to gravel pull-outs with no services.

Fees are charged for day use parking at over 132 parks units around the state and an additional 23 charge a per person entrance fee. In the four park units along the Sonoma Coast, day use parking fees are charged at Bodega Dunes, Wrights Beach, Reef, Fort Ross, Gerstle Cove, Woodside, and Fisk Mill day use parking areas. These fees are necessary to support the ongoing operations and maintenance of these facilities, including ensuring the health and safety of the public and the preservation of natural and cultural resources.

Due to passage of AB1478 in 2012, mandating a new revenue generation program, State Parks began a process to institute day use parking fees at 14 additional locations along the Sonoma Coast (“Original Fee Proposal”). The initial application to the Sonoma County Permit and Resource Management Department and subsequent appeal to the Sonoma County Board of Supervisors were denied in January and June of 2013, respectively. An appeal to the California Coastal Commission (CCC) in 2015 resulted in a finding of substantial issue and a De Novo hearing was scheduled for the following year. The following De Novo Coastal Development Permit is submitted in accordance with that finding.

Following the 2015 hearing, State Parks met with representatives of groups that opposed the proposal at the 2015 hearing. Following a series of meetings, a Revised Fee Proposal was presented that included a number of changes to the Original Fee Proposal. The number proposed for day use parking fee has been reduced from 14 to 8. The manner of fee collection was updated from the traditional “iron ranger” to a modern, technology-based fee collection device. A fee schedule with a variety of fee options based on the amount of time a parking facility is used has been developed. And, finally, a recommendation to condition the installation of parking signage and restrictions has been added to prevent excessive use of undeveloped (and therefore free) parking areas. State Parks proposes a substantially reduced proposal that has removed locations where traffic and neighborhood concerns were identified. Many beaches remain free of charge including the popular four-mile stretch from South Salmon Creek to Duncans Cove.

Like the Original Fee Proposal, the Revised Fee Proposal is consistent with the California Coastal Act and the Sonoma County Local Coastal Program. It also complies with several pieces of legislation enacted in 2012 mandating State Parks to generate revenue as an essential component of a long-term sustainable park funding strategy. The attached De Novo Application includes a summary of the revised Fee Project as well as additional data and information requested by CCC.

# **1. INTRODUCTION**

This Coastal Development Permit (CDP) application has been prepared by the California Department of Parks and Recreation (State Parks) to provide the California Coastal Commission (CCC) information regarding the Day Use Parking Fee Collection Devices Proposal at Sonoma Coast State Park (Sonoma Coast SP) and Salt Point State Park (Salt Point SP), located in Sonoma County, California. With strong passionate local visitation and visitation based on the regional and national significance, there is juxtaposition of visitor needs to manage. The proposed project would provide State Parks the ability to more effectively manage vehicular parking during peak use periods on up to 8 existing day use parking areas in Sonoma Coast State Park and Salt Point State Park, as necessary to better accommodate use and prevent deterioration of natural resources.

## **1.1 PROJECT OBJECTIVES**

The objective of this Fee Proposal is to increase revenues through the collection of day use parking fees to help offset the cost of maintenance and resource protection activities. Approval of the Fee Proposal would allow State Parks to continue to meet the Department's mission of protecting resources and providing high quality recreation.

## **1.2 PROJECT LOCATION**

The Fee Proposal includes eight different locations in two parks spread along Pacific Coast Highway 1 in Sonoma County. Sonoma Coast SP is a long, linear coastal park that extends north 19 miles from Bodega Head. The proposal includes seven parking areas in Sonoma Coast SP, including South Goat Rock, North Goat Rock, Arched View, Blind Beach, Shell Beach, Bodega East, and Bodega West and one parking area in Salt Point SP at Stump Beach parking area is included in the proposal.

## **1.3 VISITATION TO SONOMA COAST STATE PARK**

Annually, Sonoma Coast and Salt Point SPs receive approximately 3,000,000 and 275,000 visitors, respectively. Many visitors are tourists taking a leisurely trip along the world-famous Highway 1, making brief stops at the many day use areas to take in the rugged scenery and ocean views. These visitors may spend comparatively little time at any one location and utilize fewer park resources than other visitors. There are no Caltrans rest stops along Highway 1 in Sonoma County, and consequently, State Parks' day use areas and restroom facilities have become de facto rest stops.

Many visitors are local to Sonoma, Marin and Mendocino counties and make frequent visits to the park to take advantage of the recreational activities. Others come from the Central and Sacramento valleys during the summer months when valley temperatures often rise above 100 degrees. This group consists of both campers and day users.

Park records show that visitation typically peaks in June and July, coinciding with school vacations and the highest temperatures in the valley. The average day in July brings more

than 600 vehicles into the Bodega Head and Goat Rock areas and over 1,000 on a Saturday or holiday. These visitor spikes heavily tax park resources and facilities.

<b>Sonoma Coast SP Visitation</b>				
<b>Fiscal Year</b>	<b>Paid Day Use</b>	<b>Free Day Use</b>	<b>Camping</b>	<b>Total</b>
2000/2001	51,962	1,869,751	91,861	<b>2,013,574</b>
2001/2002	34,688	2,239,255	90,478	<b>2,364,421</b>
2002/2003	39,169	2,772,723	97,950	<b>2,909,842</b>
2003/2004	41,572	2,476,741	94,445	<b>2,612,758</b>
2004/2005	34,302	2,940,163	84,676	<b>3,059,141</b>
2005/2006	31,757	3,228,878	77,886	<b>3,338,521</b>
2006/2007	28,906	3,153,553	83,378	<b>3,265,837</b>
2007/2008	34,070	2,133,186	90,345	<b>2,257,601</b>
2008/2009	33,738	2,369,167	90,514	<b>2,493,419</b>
2009/2010	26,105	2,972,087	70,325	<b>3,068,517</b>
2010/2011	20,094	3,043,706	67,365	<b>3,131,165</b>
2011/2012	25,055	3,080,690	73,496	<b>3,179,241</b>
2012/2013	23,044	3,266,409	71,547	<b>3,361,000</b>
2013-2014	25,291	3,416,089	80,885	<b>3,522,265</b>

<b>Salt Point SP Visitation</b>				
<b>Fiscal Year</b>	<b>Paid Day Use</b>	<b>Free Day Use</b>	<b>Camping</b>	<b>Total</b>
2000/2001	22,419	235,575	39,592	<b>297,586</b>
2001/2002	14,210	241,100	50,372	<b>305,682</b>
2002/2003	13,509	224,417	53,260	<b>291,186</b>
2003/2004	16,722	240,940	58,144	<b>315,806</b>
2004/2005	14,080	225,043	42,860	<b>281,983</b>
2005/2006	13,552	200,403	35,112	<b>249,067</b>
2006/2007	21,186	220,840	40,502	<b>282,528</b>
2007/2008	24,608	234,259	47,004	<b>305,871</b>
2008/2009	20,276	231,533	48,150	<b>299,959</b>
2009/2010	14,374	190,511	36,438	<b>241,323</b>
2010/2011	15,723	171,087	42,884	<b>229,694</b>
2011/2012	15,593	60,489	26,268	<b>102,350</b>
2012/2013	15,780	53,115	27,334	<b>96,229</b>
2013-2014	18,680	55,375	30,327	<b>104,382</b>

## 1.4 VISITOR DATA

Vehicle trips at North Salmon, School House Beach, Bodega Head, Goat Rock, and Willow Creek have been tracked since May 2015 using TRAFx data counters. Additional traffic counters were installed in October at Portuguese Beach North/South and Shell Beach. The counters record vehicles entering and exiting the area. The number must be divided in half to determine the total number of vehicles. This method does not identify how many vehicles enter verses exit in an hour; it provides only the raw data that 70 vehicles had triggered the counter during that hour (Support, 2016).

In those areas where visitation has been consistently tracked, a predictable spike in visitation occurs during the summer, coinciding with the warmest temperatures of the year. The Bodega Head and Goat Rock areas will see between 15,000 to 20,000 total visitors during the warm summer months. On an average day, visitors began to arrive at 8:00 a.m. and visitation peaks between 12:00 p.m. and 2:00 p.m. when approximately 60 vehicles per hour move through the busiest day use areas of the park. Saturdays and Sundays are the busiest days of the week, with an average vehicle count of approximately 650 per day at Goat Rock (DataNet, 2015). A warm summer holiday, such as July 4<sup>th</sup> or Labor Day, will bring over 2,000 vehicles into the Bodega Head area where there are fewer than 200 parking spaces. Thus, over 5,000 people in 1,800 vehicles search for a parking space in one of the four Goat Rock day use parking areas.

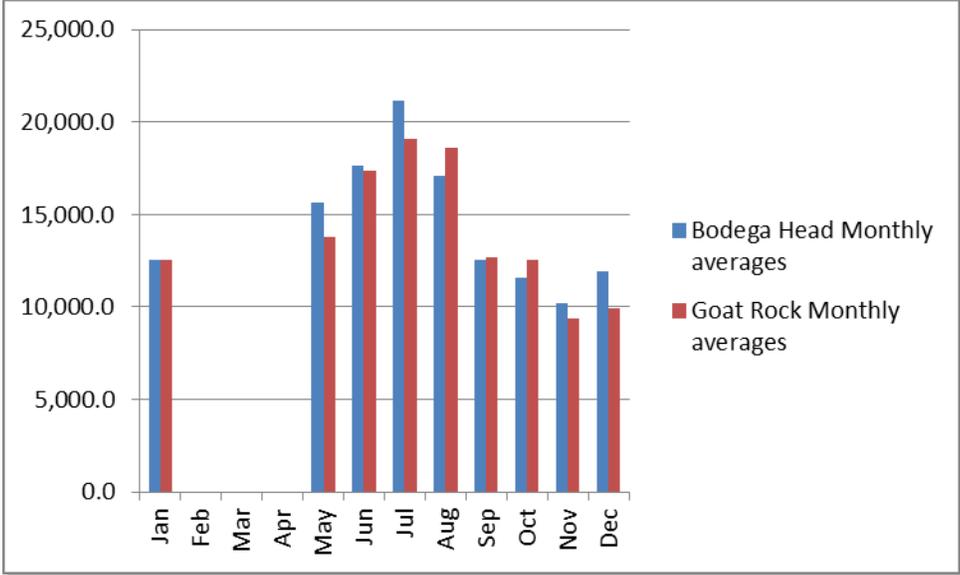


Figure 1: Monthly Vehicle Trip Averages

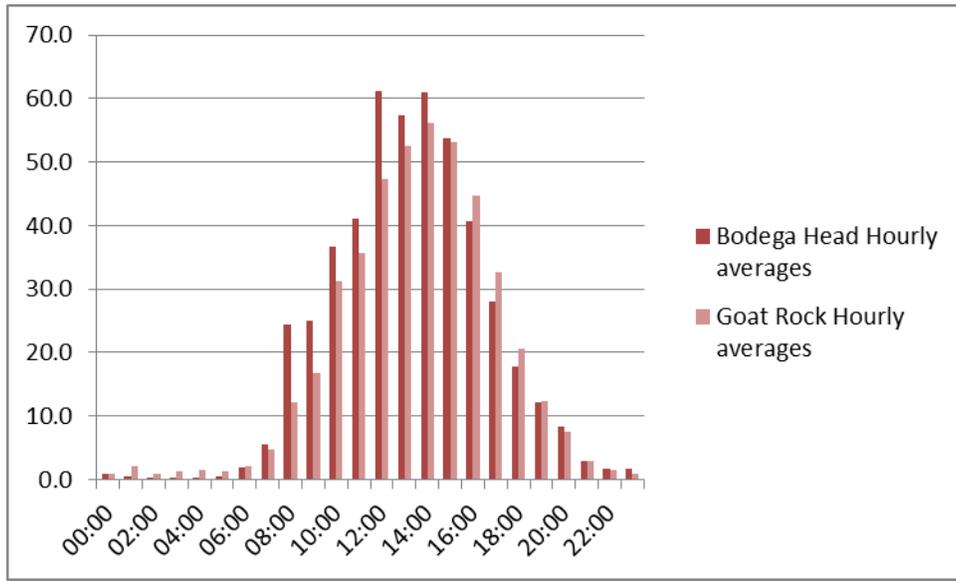


Figure 2: Hourly Vehicle Trip Averages

## 1.5 ECONOMIC IMPACT

Household incomes for visitors are relatively high with 57% earning over \$75,000 annually and only 15% earning less than \$40,000. Based on visitor zip codes, a majority of visitors are from the Sacramento and Northern San Joaquin valleys. Sacramento is the most common visitor origin while Sonoma County ranks fifth (NOAA, 2015).

The dramatic views from Sonoma Coast SP have become the face of tourism in Sonoma County. A quick look at many Sonoma County tourism brochures features waves crashing on its rocky beaches. This visitation is major economic driver in Sonoma County. On average, just under \$26 per person was spent by visitors on their trip to the coast. Together, these expenditures in the local economy totalled \$86.25 million in an estimated total output of \$145.8 million (2015\$), income of \$53.8 million and creates approximately 1,100 jobs (Vernon Leeworth, 2015).

## **2. BACKGROUND AND NEED FOR THE PROJECT**

Sonoma Coast SP is comprised of over 10,000 acres of parkland stretching for 19 miles along the Sonoma County coastline from Bodega Head in the south to north of Jenner. It also extends inland, encompassing the Willow Creek watershed and portions of the lower Russian River watershed. Developed coastal accesses include, but are not limited to (from south to north) Bodega Head, Bodega Dunes, Salmon Creek Beach, Portuguese and Schoolhouse Beach, Duncan's Landing, Wright's Beach, Shell Beach, Goat Rock and Goat Rock Beach, Jenner Visitor Center, Carrington, Red Hill, Willow Creek Watershed, Willow Creek Environmental Camp, and Pomo Canyon Environmental Camp.

Salt Point SP encompasses over 6,000 acres of parkland located on the northern Sonoma County coastline from Gerstle Cove in the south end of the park to Horseshoe Cove in the north. Developed coastal accesses include, but are not limited to (from south to north) Gerstle Cove, Stump Beach, and Fisk Mill Cove (see attached Figures 4 and 5).





## 2.1. EXISTING CONDITIONS

There are currently an estimated 2400 day use parking stalls within Sonoma Coast SP, Fort Ross State Historic Park and Salt Point SP. These include paved, gravel and shoulder parking where visitors routinely park under existing baseline conditions. Approximately 600 spaces (25%) in 13 day use parking areas are currently subject to a flat \$8 daily fee. A day use pass is currently valid for parking at any recognized day use area managed and operated by State Parks during the date of purchase and operational hours, which may vary by park unit. The breakdown of existing parking including fee and non-fee for Sonoma Coast and Salt Point SPs, can be seen in Appendix A.

State Parks' Annual Statistical Report notes Sonoma Coast SP as the fourth-most visited park in the system. Because it is spread along 19 miles of the coastline and has many possible entry points, beach activity occurs 24 hours a day. Thus, demands on Sonoma Coast SP's facilities are considerable. The result of the high visitation levels, resource impacts and the limited maintenance budget is readily apparent in the condition of some of the facilities. Moreover, ranger, maintenance, and operations staffing levels are not appropriately aligned with the level of visitation, maintenance and resource protection needs. These deficiencies in staffing and maintenance are due in large part to the limited amount of revenue generated at the park.



Figure 4: Full Parking Lot and Whale Watchers on Bodega Head

## 2.2. FEES AT OTHER COASTAL STATE PARKS LOCATIONS

Fort Ross State Historic Park is located immediately adjacent to Salt Point SP. Fort Ross SHP has 4 developed parking/day use areas and 3 other highway shoulder areas. Of the developed areas (Upper Reef, Lower Reef (AKA Reef CG), Main Lot, Windermere Point), 3 of those are currently day use fee areas at an \$8 daily rate. Approximately 90% of the parking stalls at Fort Ross SHP require payment of a day use fee.

In Mendocino County State Parks located within the coastal zone, California State Parks operates 36 separate day use areas. Of those, only 4 charge a day use fee of \$8.00 per car. In Fiscal Year 13-14, this amounted to \$71,999 of paid day use revenue.

Marin County is perhaps a much better demographic and population comparison to Sonoma County. Most coastal State Park units in Marin County are located in the jurisdiction of the San Francisco Bay Conservation and Development Commission, but are coastal units nonetheless. Many of these do charge day use fees, which vary from \$5 to \$8.

There are no coastal State Park units in Humboldt or Del Norte Counties that require day use fees.

### 2.3. DISTRICT BUDGETARY IMBALANCE

The General Fund declined from a high of 90% of State Parks' operating budget in FY 1979-80 to 29% in the FY 2012-13 budget, making State Parks more dependent than ever on revenues earned through user fees and concessions. Said another way, this change in funding has made State Parks more of an enterprise organization and less of a traditionally funded State department (Matthew Buttice, 2013).

Currently, operations at Sonoma Coast SP are heavily subsidized by other parks in the system because of the limited amount of revenue that is captured within the park, as well as the harsh coastal conditions that result in the rapid deterioration and increased costs necessary to maintain its facilities.

Year	Paid Visitation	Direct Expenditures	Indirect Expenditures	Total Expenditures	total gain/(loss)	% of total Exp. covered
<b>Sonoma Coast State Park</b>						
2013/2014	\$768,878	\$2,716,979	\$1,303,677	\$4,020,656	\$(3,251,778)	19%
<b>Salt Pont State Park</b>						
	\$379,899	\$1,255,889	\$590,168	\$1,846,057	\$(1,466,158)	21%

State Parks in Sonoma County comprise nearly 39,000 acres, see 5.7 million visitors per year, and have a net visitor cost average of approximately \$2.31. Compare that to the Sonoma County Regional Park District which encompasses 11,000 acres, 5.1 million visitors and a net cost per visitor of only \$.70.

### 2.4. LEGISLATIVE MANDATE

Pursuant to Public Resources Code Section 5010, State Parks is authorized "to collect fees, rents, and other returns for the use of any state park system area, the amounts to be determined by [State Parks]." Based on this authority, State Parks has established and modified fees throughout the state park system for over 100 years. More recently, the California Legislature passed several laws in 2012 that require State Parks to develop a revenue generation program and work to improve its financial situation. Senate Bill 1018, the trailer bill for the FY 2012-13 budget year, provided for core funding and requirements for development of a revenue generation program. Assembly Bill 1478 (Blumenfield) created the State Parks Enterprise Fund and clarified goals of the revenue generation program, including the creation of a revenue incentive program for park districts. Assembly Bill 1589 (Huffman)

created the State Parks Protection Fund and requires that the Department create a prioritized action plan to increase revenues and collection of user fees at state parks.

## **2.5. REVENUE DISTRIBUTION REQUIREMENTS**

In general, fees collected at state park units are deposited in the State Parks and Recreation Fund (SPRF), which is available to State Parks upon appropriation by the Legislature. While State Parks cannot commit future Legislatures to specific appropriations, increased revenue generation would provide more opportunity for State Parks to request funding for projects specific to the Sonoma Coast. Additionally, through the passage of AB 1478, Public Resources Code §5010.7(a) requires State Parks to set revenue targets annually and Public Resources Code §5010.7(d) states that any park that exceeds its revenue target shall receive a 50% return. This funding may be used to enhance visitor services and amenities and maintain or increase revenue generating opportunities, where currently these opportunities are limited.

The current revenue target for the Sonoma Mendocino Coast District, of which Sonoma Coast SP and Salt Point SP are a part, is approximately \$3.1 million. Generally, revenue targets are set annually based on the average of the prior three years of revenue collection plus an adjustment for inflation. Therefore, it is expected that by implementing a fee collection program, Sonoma Mendocino Coast District will exceed its revenue target and realize an increase in revenue returned directly to the district. Please see Appendix B for the revenue projections for the fee collection devices.

The increase in revenue received as a result of this program will make direct service enhancements such as improvements to bathrooms, parking lot improvements, and facilities upgrades at these Parks possible, where currently these opportunities are limited.

## **2.6. COASTAL PERMITTING EFFORTS**

Since as far back as 1992, State Parks has contemplated installing day use parking fee collection in Sonoma County coastal park units as a means to generate revenue to fund expansion of park programs and to offset the costs of performing routine park maintenance.

These efforts were the subject of litigation, for which State Parks ultimately prevailed at the California Court of Appeals in 1994, though the fee collection devices were never installed. Those efforts were abandoned when the State Budget authorized additional spending for State Parks.

The most recent attempt to install day use parking fees began on February 22, 2012, when State Parks filed a Notice of Exemption to install self-pay stations at 15 locations along the Sonoma County Coast (See Appendix C). State Parks subsequently filed an application with Sonoma County Permit and Resource Management Department (PRMD) on May 31, 2012, for a Coastal Development Permit.

However, the County Board of Supervisors (BOS) preemptively adopted Resolution 12-0409 on August 21, 2012, opposing new parking fees until State Parks "has adequately accounted

for all funding streams and determined no other viable funding alternatives exist to ensure free and open access to parks.”

The Sonoma County Board of Zoning Adjustments (BZA) subsequently denied State Park’s application on January 17, 2013 and on June 18, 2013, the BOS denied State Park’s appeal of the BZA’s decision. State Parks appealed the BOS decision to the CCC and on April 15, 2015 the CCC found that substantial issues existed and granted State Parks a de novo hearing.

## 2.7. PUBLIC OUTREACH EFFORTS

At the April 2015 hearing, the CCC requested that State Parks engage with stakeholders in an outreach program to solicit input and search for a consensus on a fee proposal. Beginning in July 2015, State Parks convened (and CCC directed) the Sonoma Coast Fee Issue Working Group consisting of State Parks, County of Sonoma (Supervisor Carrillo, Permit Resource Management Department, and Sonoma County Regional Parks), Sonoma County Surfrider Foundation, Sonoma County Conservation Action, Coastwalk, Bodega Bay Fire Department, and Stewards of the Coast and Redwoods. The group met seven times to discuss State Park’s need for the project, site characteristics, proposed fees and passes and other opportunities to address concerns that have been raised by stakeholders.

Meeting Date	Attendees
Jul 15 <sup>th</sup>	State Parks, Surfrider, Sonoma County Conservation Action, Coastwalk
Oct 12 <sup>th</sup>	State Parks, Surfrider, Sonoma County Conservation Action, Coastwalk, PRMD, SCRPP, BOS Representative, Stewards, CCC
Nov 23 <sup>rd</sup>	State Parks, Surfrider, Sonoma County Conservation Action, Coastwalk, Stewards, CCC, BBFD SCRPP, BOS Office, Stewards
Dec 14 <sup>th</sup>	State Parks, Surfrider, Coastwalk, CCC, BBFD SCRPP, Stewards
Jan 6 <sup>th</sup>	State Parks, Surfrider, Coastwalk, BOS Office, Stewards
Jan 20 <sup>th</sup>	State Parks, Surfrider, Coastwalk, BOS Office, Stewards
Feb 3 <sup>rd</sup>	State Parks, Surfrider, Coastwalk, Stewards, CCC, BOS Office
Feb 17 <sup>th</sup>	Public meeting

The Working Group’s goal was to balance the input from the local community, the requirements of the Coastal Act, and the inherent challenges of managing and protecting natural and cultural resources of the state park system. The group presented a Revised Fee Proposal including administrative actions that could address many concerns that were articulated during the County and coastal permitting process. These actions are solely administrative in nature, are statutorily exempt from CEQA. In general, the group did not support fee collection.

### Administrative Actions

- \$8/day for new fee areas. Good for day use in all state parks on date of purchase;
- Provide hourly rates (up to \$3/hour) where possible;
- Develop Sonoma Coast SP Pass for access to Sonoma County coastal park units (Fort Ross, Salt Point, Sonoma Coast);

- Disseminate information on existing Low Income Pass to Sonoma County residents;
- Work with stakeholders and CCC to explore alternatives for low income, undocumented residents for fee areas;
- Provide for free visitation for “surf checks” of up to 30 minutes;
- Minimize future service reductions in areas where no fees are collected;
- Use retained revenue pursuant to Public Resources code §5010.7(d) for improved services along the Sonoma Coast (facility improvements, housekeeping, interpretive programs, trail maintenance, natural and cultural resource management, etc.);
- Implement Sonoma Coast Advisory Group to build and maintain community trust (broad representation to potentially include, conservation, recreation, economic, allied agency, and political interests).

As a result of its dialogue with the Working Group, State Parks identified the following key considerations that influenced the scope of the Revised Fee Proposal.

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**Natural and Cultural Resource Protection:**

New fee locations must consider and minimize direct and indirect impacts to natural and cultural resources. Areas where any new facilities are proposed for development generally has been previously disturbed and are absent of natural and cultural resources of significance. For instance, fee collection devices would be located in already developed parking lots.

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**Public Safety:**

State Parks recognizes that there are a few locations where patrons may elect to park informally and walk-in rather than pay a day use fee. These locations include parking areas adjacent to neighborhoods and/or with ample shoulder parking. Traffic safety may be compromised by short lines of site, narrow roads, or unsafe pedestrian crossings of Highway 1. Locations with public safety concerns include Russian Gulch, North Salmon Creek, Schoolhouse, and Portuguese Beach.

The Bodega Bay fishing community depends on the ability to check surf conditions from Bodega Head. To maintain this critical access, no gate will be installed at the proposed Bodega Head entrance station or West Lot. Access will be unimpeded by hours of operation and no fees will be charged for a “surf check”.

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**Services and Activities:**

Sites with developed facilities and ample recreational activities provide more value to park visitors and there is a reasonable expectation for user fees. High service and activity value sites include Goat Rock, Shell Beach, Bodega Head, and Stump Beach. Sites with lower service and activity values include; Portuguese Beach, Schoolhouse Beach, North Salmon, Bean Avenue, and Russian Gulch.

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**Revenue:**

Sites with high services and activities, promontories and park like settings tend to attract the greatest number of visitors. These types of sites include Goat Rock, Bodega Head, and Shell Beach.

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**Entrance Station v. Fee Collection Devices:**

In many regards, entrance stations are preferable to several independently fee collected parking areas in certain situations. Staffed entrance stations provide an important source of information for the visiting public. The need to monitor separate parking lots is reduced when all vehicles pass through an entrance station. In areas where there is a relatively high number of parking areas and ample shoulder parking, the presence of entrance stations reduces illegal parking and associated social trails, litter, and waste that results. These sites include Bodega Head and Goat Rock.

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**Traffic and Parking Impacts:**

State Parks recognizes that there are a few potential locations where patrons may elect to park informally and walk-in rather than pay a day use fee, creating new parking areas and associated social trails through sensitive habitats. Sites located adjacent to neighborhoods and/or environmentally sensitive areas include North Salmon, Bean Avenue, Schoolhouse Beach, Shell Beach, and Portuguese Beach.

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**Spatial Arrangement:**

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Limited free coastal access should be distributed in a manner that provides access to key roadways used by park visitors. Locations with low to moderate services and activities should be removed from any fee implementation proposal. These sites include Russian Gulch and Salmon Creek.

Using the criteria and considerations above, the project scope was revised and several areas included in the Original Fee Proposal were removed from the project scope. Parking areas no longer part of the proposal include; Bean Avenue/South Salmon, Portuguese, North Salmon, Schoolhouse Beach, and Russian Gulch, for a total of 222 parking spaces.

The concept of manned entry stations at several of locations received tacit support from the Working Group. Although entry stations would have far higher construction, operation, and long-term maintenance costs, they provide the first and frequently only point of contact between the public and State Parks staff and are therefore a valuable source of information to park visitors. State Parks revised the plan to provide entry stations at Bodega Head, Goat Rock and Willow Creek and was in the process of preparing an Initial Study/Mitigated Negative Declaration evaluating potential impacts when it held an Open House to present the much altered proposal.

The Revised Fee Proposal was presented to the public at an open house in Sebastopol on February 17, 2016. The workshop was intended as a means to present the revised concept to demonstrate the efforts State Parks had taken in response to the opposition raised at the numerous early hearings that occurred as a prelude to the County's early denial at the local level. The meeting quickly became contentious and State Parks was never able to fully articulate its vision. What the attendees made clear however, was their determination to resist implementation of any new fees. As the entry stations were received with little support from the public they were subsequently removed from the proposal considering both cost and potential delays.

## **2.8. PUBLIC COMMENTS AND STATE PARKS RESPONSES**

State Parks met with the Rock Ice & Mountain Club who did not support the fee proposal generally. Their primary concern however, was preserving reasonable access and adequate parking to the Sunset Rocks considered by some to be the birthplace of rock climbing in Sonoma County. The proposed kiosk location would have eliminated roadside parking areas that are considered essential access point for the climbing community. This is not an issue now as the kiosks are no longer being considered under this proposal.

Comments received from the public at and following the February 17<sup>th</sup> Open House, along with State Parks responses to those comments can be seen in Appendix D.

### 3. THE PROJECT

#### 3.1 PROJECT DESCRIPTION

##### Locations

The Original Day Use Parking Fee Proposal included self-pay stations at 14 locations in Sonoma Coast SP and Salt Point SP, converting approximately 814 free spaces to paid spaces. Based on the input of the CCC, the Working Group, and the general public, State Parks reduced the number of parking areas from 14 to 8, including; Stump Beach, Goat Rock North, Goat Rock South, Arched View, Blind Beach, Shell Beach, Bodega East and Bodega West. The characteristics of each site proposed fee collection area are as follows:

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##### **Goat Rock Area (North Goat, South Goat, Blind View and Arched View)**

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- Single ingress and egress, State Park owned and maintained road, 2 miles to beach. Four paved, maintained parking areas including North Goat, South Goat, Arched View and Blind Beach (North Goat lot striped for 68 vehicles, four lots total 80,200 sq. ft.), numerous shoulder parking locations, 3 comfort stations, picnic tables, drinking water (North Goat), beach access and trail connectivity (Kortum, Pomo, Red Hill and Willow Creek).
- Hiking, landscape and wildlife viewing, fishing, surfing, river and beach access.
- Adjacent uses; parkland, Goat Rock residences, near Jenner.
- Sensitive resources include coastal dunes, coastal bluffs, coastal prairie, wetlands, Species of Special Concern, nesting raptors, seal colony, estuary, archaeological and historical features.
- Average monthly vehicle trips 13,997.7, maximum 19,118. Average daily vehicle trips 445.8, maximum 2,025.
- Visitation trends toward long stay.

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##### **Bodega Head Area (East Bodega and West Bodega)**

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- Single ingress and egress, 1 mile to beach with several parking lots en route. Two gravel parking lots include East and West Bodega Head Day Use. Campbell Cove is a paved lot. The three parking lots total (68,500 sq. ft.), 3 comfort stations, picnic tables, trails (including ADA accessible), docent programs.
- Hiking, landscape and wildlife viewing, fishing, beach access.
- Adjacent uses, parkland, UC Bodega Reserve/Marine Lab.
- Average monthly vehicle trips 14,485.7, maximum 21,173. Average daily vehicle trips 474.9, maximum 1,812.
- Visitation trends toward shorter stay; strongly affected by weather conditions.
- Sensitive resources include coastal prairie, coastal bluffs, nesting raptors, and owls, wetlands, Species of Special Concern, archaeological and historic features.

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##### **Shell Beach**

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- Single ingress and egress. Paved, striped parking area for 42 standard-size vehicles and 2 ADA sites (35,800 sq. ft.), in addition, shoulder parking at entrance, a comfort station and coastal access. Serves as a trailhead for the popular Pomo, Red Hill and Kortum Trails.
- Hiking, wildlife and landscape viewing, fishing, beach access.
- Adjacent uses; parkland, three nearby residences.
- Sensitive resources include coastal prairie, coastal bluffs, tide pools, Species of Special Concern, and archaeological sites.

- Free parking for approximately 66 vehicles exists along Pacific View Road, a Sonoma County owned road (29,400 sq. ft., mostly undeveloped subdivision) immediately north of this parking lot. Existing free parking will compete with proposed fee lot.
- Estimated high vehicle count, medium level of service. Currently insufficient user data for projections, but traffic monitors in place.
- Visitation trends toward long stay.
- Fee collection device in parking area and any needed site improvements.

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### **Stump Beach**

- Gravel parking area (unstriped, 11,300 sq. ft.), restroom, picnic tables, designated trail access to the beach area below, bluff trail north and south and Stump Beach Trail to interior with connectivity to Kruse Rhododendron and Salt Point State Park trail systems.
- Hiking, landscape and wildlife viewing, fishing, mountain biking, equestrian, beach access.
- Adjacent uses; parkland.
- Sensitive resources include coastal prairie, riparian habitat, coastal bluffs, tide pools, Species of Special Concern, and archaeological sites.
- Estimated medium/low vehicle count, medium level of services. Currently insufficient user data for projections, but traffic monitors in place.
- Visitation trends toward longer stay.
- Fee collection device in parking area and any needed site improvements.

### **Pay Stations**

The Original Fee Proposal developed in 2007 called for the use of self-pay stations referred to as “iron rangers”, which consist of an old style and inefficient square iron tube set in concrete three feet into the ground and extending from 32 to 38 inches above the ground. Today State Parks uses a more technologically advance form of self-pay machines referred to as Automated Payment Machines (APM). APMs are solar powered capable of having Wi-Fi connectivity to allow for the purchase of a day use pass with a debit or credit card or cash, but can also accept all forms of payment without connectivity. APM provides data on parking usage that will provide State Parks with better user information on which to base management decisions or otherwise direct resources.

Two types of machines will be installed: “pay-in-line” and “pay-on-foot”. Machines will be installed at each of the identified parking lots. Site plans showing proposed specific locations are included in the Appendix D. Visitors will be expected to park and then walk to the machine, print out the ticket, and post it on their dash. Both types of machines will be compliant with ADA and capable of accepting payment by credit or debit card or cash. Neither machine will accept coins or give change. The APM can be programmed to sell a variety of parking passes and can be easily updated with new fee schedules or other parameters. The system will be able to generate reports of statistical information on demand. Other features of the APM are described below.

A typical APM installation would include the following design features. It should be noted that not all installation sites are the same and variation will occur from site to site.

## **Automated Pay Machines**

### **Physical Design Features:**

- Solid concrete footing to securely anchor each station to the ground;
- Construction of a concrete pad in front of the APM in compliance with current ADA Accessible Guidelines. This would include obstacle free transitions to existing paved surfaces;
- Installation of informational and regulatory signs as required. Signage typically measures no more than 28" in width and no more than 84" above finished grade.
- Construct accessible pad in front of APPM which entails removing approximately 72ft<sup>2</sup> of existing asphalt, grade to level and resurface with 4" of asphalt over 4" of compacted aggregate base;
- Construction of the appropriate number of accessible parking spaces commensurate with parking lot capacity.
- Construction of ADA compliant concrete paths to connect accessible parking with fee stations. .

### **3.2. FUTURE VISITOR ENHANCEMENTS UNDER SEPARATE PERMIT OR MAINTENANCE**

A proposed list of projects associated with proposed fee collection locations has been developed and can be found in the Appendix F. Both short term and long term projects have been identified. Some are simply deferred maintenance and others may require additional analysis.

### **3.3. PROJECT IMPLEMENTATION**

The improvements covered in this review could be completed as part of a single contract or staged in phases. All improvements would be limited to the existing footprint of the parking lot. Any area necessary for storage or staging of materials will be limited to existing developed areas.

Installation of the fee collection devices could begin as early as the spring of 2017 and could continue for several months. Work would occur only during daylight hours and would be scheduled to incur the least amount of impact to visitors. However, weekend work could be implemented to accelerate construction or address emergency or unforeseen circumstances.

Road maintenance equipment, such as graders, loaders and dump trucks, could be used during various aspects of construction and installation. Most equipment would be transported to the site and remain there until work is completed. Vehicles for the transportation of materials, equipment, and crew will also enter the parking lot locations intermittently. Staging areas for equipment will be confined to the existing parking areas and other previously-disturbed areas.

Best Management Practices (BMPs) will be incorporated into the project design to ensure that the natural resources in and around the project are adequately protected during and after

construction. The BMPs discussed in this document and used in the implementation of this project were obtained from the *California Stormwater Quality Association (CSQA), Stormwater Best Management Practices Construction Handbook*. BMPs will be used to keep sediment on-site throughout the project. During construction, BMPs will be checked, maintained, and modified daily and as needed. BMPs will also be used after construction to stabilize the site and minimize erosion.

State Parks has consistently referenced CSQA BMPs and has identified them as an acceptable standard for use in all state parks.

### 3.4 PROJECT REQUIREMENTS

Under CEQA, the Department of Parks and Recreation has the distinction of being considered a *lead agency*, a public agency that has the primary responsibility for carrying out or approving a project and for implementing CEQA. A *responsible agency* is a public agency other than the lead agency that has responsibility for carrying out or approving a project and for complying with CEQA. A *trustee agency* is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. With this distinction comes the responsibility to ensure that actions that protect both cultural and natural resources are always taken on all projects. Therefore, State Parks maintains a list of Project Requirements that are included in project design to reduce impacts to resources.

State Parks has developed a list of Standard Project Requirements (SPR) that are used to avoid significant project-related impacts to the environment. SPR are assigned, as appropriate to all projects. For example, projects that include ground-disturbing activities, such as trenching, will always include SPRs to address the inadvertent discovery of archaeological artifacts. However, for a project that replaces a roof on an historic structure, ground disturbance would not be necessary, and therefore, SPRs for ground disturbance would not be assigned to the project.

State Parks also makes use of Specific Project Requirements to address project impacts for projects that have unique issues. Both Standard and Specific Project Requirements that apply to the Revised Fee Proposal are described below.

<b>Standard and Specific Project Requirements for the Revised Fee Proposal</b>	
<b>Natural Resources</b>	
<b>Cultural Resources</b>	
Specific Project Requirement: Cult 1	A State Parks archaeologist may monitor ground-disturbing activities in areas identified with a moderate to high degree of archaeological sensitivity. These locations will be coordinated with the project and construction managers. Other archaeological monitoring needs are at the discretion of the State Parks archaeologist.
Specific Project Requirement: Cult 2	A State Parks archaeologist will review all BMPs and SWSLPP developed for the project.
Specific Project Requirement: Cult 3	During construction, a State Parks archaeologist must review and approve all change orders/RFIs that include ground disturbing

	activities or changes in location.
Specific Project Requirement: Cult 4	Unless a State Parks archaeologist review and approves disposal areas within the park, spoils generated from the project will be disposed of outside of the park.
Specific Project Requirement: Cult 5	A State Parks archaeologist will approve all staging locations for materials and equipment.
Standard Project Requirement: Cult 1 Inadvertent Discovery	<p>a) In the event that previously unknown cultural resources (including but not limited to dark soil containing shellfish, bone, flake stone, groundstone, or deposits of historic trash) are encountered during project work by anyone, the state representative will put work on hold at that specific location and contractors will be redirected to other areas (tasks). A State Parks -qualified archaeologist will record and evaluate the find and work with the state representative to implement avoidance, preservation, or recovery measures as appropriate to any work resuming at that specific location.</p> <p>b) In the event that significant cultural resources are found in the project location, a qualified historian and/or archaeologist will monitor all subsurface work including trenching, grading, and excavations in that area from that point forward to ensure avoidance of significant cultural material.</p>
Standard Project Requirement Cult-2: Human Remains	In the event that human remains are discovered, work will cease immediately in the area of the find and the project manager will notify the appropriate State Parks personnel. Any human remains and/or funerary objects will be left in place or returned to the point of discovery and covered with soil. The DRP Sector Superintendent (or authorized representative) will notify the County Coroner, in accordance with §7050.5 of the California Health and Safety Code, and the Native American Heritage Commission (or Tribal Representative). If a Native American monitor is on-site at the time of the discovery, the monitor will be responsible for notifying the appropriate Native American Authorities.

<b>Hazards</b>	
<p>Standard Project Requirement: Hazmat-1: Spill Prevention and Response</p>	<ul style="list-style-type: none"> <li>▪ Prior to the start of construction, all equipment will be cleaned before entering the project site. During the project, equipment will be cleaned and repaired (other than emergency repairs) outside the project site boundaries. All contaminated spill residue, or other hazardous compounds will be contained and disposed of outside the boundaries of the site at a lawfully permitted or authorized destination.</li> <li>▪ Prior to the start of construction, all equipment will be inspected for leaks and regularly inspected thereafter until removed from the project site.</li> <li>▪ Prior to the start of construction, a Spill Prevention and Response Plan (SPRP) will be prepared to provide protection to on-site workers, the public, and the environment from accidental leaks or spills of vehicle fluids or other potential contaminants. This plan will include but not be limited to the following: <ul style="list-style-type: none"> <li>▪ A map that delineates construction staging areas, and where refueling, lubrication, and maintenance of equipment will occur.</li> <li>▪ A list of items required in an on-site spill kit that will be maintained throughout the life of the project.</li> <li>▪ Procedures for the proper storage, use, and disposal of any solvents or other chemicals used during the project.</li> <li>▪ Identification of lawfully permitted or authorized disposal destinations.</li> </ul> </li> </ul>
<p>Project Specific Requirement Hazmat-2: Wildfire Avoidance</p>	<ul style="list-style-type: none"> <li>▪ For any work during red flag conditions, a Fire Safety Plan will be developed and approved by the local CalFire Battalion Chief.</li> <li>▪ Spark arrestors or turbo-charging (which eliminates sparks in exhaust) and fire extinguishers will be required for all heavy equipment.</li> <li>▪ Construction crews will be required to park vehicles away from flammable material, such as dry grass or brush. At the end of each workday, heavy equipment will be parked over asphalt, or concrete to reduce the chance of fire.</li> </ul>

<b>Hydrology</b>	
Standard Project Requirement Hydro-1: Erosion and Sediment Control / Pollution Prevention	Prior to the start of construction involving ground-disturbing activities, the District will prepare and submit a Storm Water Soil Loss Pollution Prevention Plan (SWSLPPP) for State Parks approval that identifies temporary Best Management Practices (BMPs) (e.g., tarping of any stockpiled materials or soil; use of silt fences, straw bale barriers, fiber rolls, etc.) and permanent (e.g., structural containment, preserving or planting of vegetation) for use in all construction areas to reduce or eliminate the discharge of soil, surface water runoff, and pollutants during all excavation, grading, trenching, repaving, or other ground-disturbing activities. The SWSLPPP will include BMPs for hazardous waste and contaminated soils management and a Spill Prevention and Control Plan (SPCP), as appropriate.
<b>Noise</b>	
Standard Project Requirement Noise-1: Noise Exposure	<ul style="list-style-type: none"> <li>▪ Project-related activities will generally be limited to the daylight hours, Monday through Friday. However, weekend work will be implemented to accelerate construction or address emergency or unforeseen circumstances. If weekend work is necessary, no work will occur on those days before 8:00 a.m. or after 6:00 p.m.</li> <li>▪ Internal combustion engines used for any purpose in the project areas will be equipped with a muffler of a type recommended by the manufacturer. Equipment and trucks used for project-related activities will utilize State Parks -approved noise control techniques (e.g., engine enclosures, acoustically attenuating shields or shrouds, intake silencers, ducts, etc.) whenever feasible and necessary.</li> <li>▪ Stationary noise sources and staging areas will be located as far from visitors as possible. If they must be located near visitors, stationary noise sources will be muffled to the extent feasible, and/or where practicable, enclosed within temporary sheds.</li> </ul>

**3.5. PROJECT OPERATION AND MAINTENANCE**

There will be no change in operational hours as a result of the project. Operation and maintenance of the project is referenced in Appendix G.

**3.6. ANNUAL PASSES AND OTHER FEE ASSISTANCE PROGRAMS**

State Parks offers several low or no-cost passes to certain eligible individuals. For example, persons with a permanent disability are eligible to purchase a lifetime pass that entitles the user to a 50% discount on all park fees for a nominal processing fee of \$3.50.

The Distinguished Veteran Pass is free to honorably discharged war veterans and entitles the user to free day use, camping and boat use at all units of the state park system. The Golden

Bear Pass is available for a \$5 processing fee to any qualifying person receiving Supplemental Security Income (SSI) [CA State Welfare and Institutions Code § 12200]; any person receiving aid under the applicable aid codes in the CalWORKS Program; or any persons 62 years of age or older with an income limitation. The Golden Bear pass entitles the bearer and spouse or registered domestic partner free entry to most State Park-operated units.

State Parks also offers the Limited Golden Bear Pass for \$20 to any persons aged 62 or older. This pass entitles the holder and spouse or registered domestic partner free entry to most State Park-operated units during non-peak season. If a person does not qualify for one of these passes, State Parks also offers the Golden Poppy Pass at a cost of \$125 per year, which provides entry into most State Park-operated units with the exception of Hearst Castle and Southern California beaches. State Parks proposes to post information about the available pass options at the new automatic payment machine locations.

State Parks also manages a robust “Volunteer In Parks” program in which volunteers can earn local or Statewide day use passes in return for volunteer service. In the Sonoma Mendocino Coast District, State Park volunteers who provide 24 hours of service annually, receive a complimentary day use pass for 23 State Park units in Sonoma and Mendocino counties. State Park volunteers, who provide 200 or more hours of service annually, receive a complimentary day use pass for all California State Parks.

Pursuant to PRC 5010.2, State Parks waives day use fees for public and private school groups upon advance request. This would apply to the proposed day use parking fee areas of the project.

Pursuant to PRC 5009.1 (b) and (d), State Parks may enter into agreement with individuals, groups or organizations to accept services that benefit the mission of the Department and may in turn, waive or reduce fees for said services when the public benefit received from the services is deemed to exceed or compare to the value of the fees/park access.

The Department is currently working on a more comprehensive Statewide plan to address the effects of day use parking fees on access to ancestral tribal lands on State Park property.

Finally, State Parks is working on a local pass for which the parameters are currently being discussed.

### **3.7. PROJECT OVERSIGHT**

The Sonoma Coast Advisory Group (SCAG) is a is integral planning and operations of the Sonoma Mendocino Coast District (SMCD) of California State Parks, serving as a citizen's advisory group to SMCD on state park-related issues.

The SCAG will be re-established by the SMCD in January, 2017. This panel of individuals, appointed by the SMCD Superintendent, with the advice of the California Coastal Commission, will ensure the public has a voice in the operations, planning and development of Sonoma County Coasts' state parks. Membership makeup and bylaws will be forthcoming. Meetings will be held between four and six times per year.

## **4. CONSISTENCY WITH APPLICABLE PLANS AND POLICIES**

### **4.1. CONSISTENCY WITH CEQA**

In 2012, State Parks determined that there would be no significant effect from the implementation of day use parking fee collection at 14 locations on the Sonoma Coast including those eight in the Revised Fee Proposal. The installation of fee collection devices are specifically exempted in State Park's CEQA implementation procedures pursuant to Section 15311, Class 11 of CEQA. Furthermore, under Section 15273 of the CEQA Guidelines, the imposition of fees is not considered a project under CEQA.

Section 15273: CEQA does not apply to the establishment, modification, structuring, restructuring, or approval of rates, tolls, fares or other charges by public agencies which the public agency finds are for the purpose of meeting operating expenses, purchasing/leasing supplies, equipment or materials, or meeting financial reserve needs and requirements.

Many of the comments received by Sonoma County during the BOS appeal hearing emanated specifically from economic or social justice concerns. A social or economic change related to a physical change may not be considered in determining whether the physical change is significant.

Section 15382: There are limits to what is considered a significant effect on the environment. A "significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An *economic or social change* by itself shall not be considered a significant effect on the environment.

While State Parks recognizes the unpopularity with parking fees, Section 15064(f)(4) specifies that a "public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence before the agency that the project may have a significant effect on the environment."

In summary, the Revised Fee Proposal is consistent with CEQA and State Park's CEQA implementation guidelines. Moreover, the NOE filed in 2012 remain valid.

### **4.2. CONSISTENCY WITH THE SONOMA COUNTY LOCAL COASTAL PLAN**

State Parks believes both the Original and Revised Fee Proposals are consistent with the Sonoma County Local Coastal Plan (LCP). The County acknowledged in their 2013 staff report that no provision of the Sonoma County Local Coastal Plan or the Coastal Act preclude or prohibit collection of parking fees in state park day use parking areas. The basis on which the County made their findings was in reference to Figure V of the Plan, entitled "Access Plan Description and Recommendations". As an example, the LCP discussion for Goat Rock Ocean Access says simply, "Four accessways are available from Goat Rock Road" and the

recommendation says only, “No change”. The staff report concluded that this notation meant an amendment would be required to change these locations from free parking to fee parking.

### 4.3. CONSISTENCY WITH THE CALIFORNIA COASTAL ACT

The Revised Fee Proposal is consistent with the California Coastal Act, including maximizing public access and ensuring the ability of public agencies to manage coastal resources. The Coastal Act is mostly silent with respect to fees either in support or opposition. In fact, there are numerous references to managing access and protection from overuse.

The California Coastal Plan (Plan), prepared in 1975 contained several Major Findings and Recommendations with respect to parking and access. The Plan acknowledged that parking at the coast had to be regulated or otherwise much of the coastline would be paved by parking. It also noted that recreational areas would be managed to respect the natural capacity of park lands. Policy 124 of the original Plan notes that “areas to which the public has the right of access shall be managed, maintained and controlled by public agencies. The Coastal Act also contains the following regulations that influenced State Park’s project scope:

Coastal Act Policy	Consistency Analysis
<p>Section 30210 Access; In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.</p>	<p>This Coastal Act Section emphasizes the mandate of Maximum Public Access to the coast but acknowledges that there must be limits. Under State Park’s revised plan, maximum public access is maintained consistent with the Coastal Act, but will grant State Parks the ability to better manage the park to protect natural resource areas from overuse.</p>
<p>Section 30212.5 Public facilities; distribution: Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.</p>	<p>Section 30212.5 recognizes overcrowding and overuse as significant issues requiring active management efforts; precisely what the proposed project was designed to provide. Non-fee parking areas will remain spaced throughout Sonoma Coast SP so as to better facilitate spacing of crowds during peak day use periods, reducing the risk of overcrowding and overuse in State Park’s more heavily-utilized areas.</p>
<p>Section 30213 Lower cost visitor and recreational facilities; encouragement and provision; Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.</p>	<p>Section 30213 of the Coastal Act perhaps speaks closest to the issue of fees within the Coastal zone. The term “lower cost” is used to promote facilities and access for those who are least able to afford to pay but it clearly does not suggest fees should never be required in any coastal location. To meet this provision, State Parks has revised the plan to maintain free day use parking areas around and within the vicinity of the proposed fee areas. Furthermore, State Parks offers the \$5 Golden Bear Pass to any qualifying person receiving Supplemental Security Income (SSI) [CA State Welfare and Institutions Code Section 12200]; any person receiving aid under the applicable aid codes in the CalWORKS Program; or any person 62 years of age or older</p>

	with income limitations.
<p>Section 30214 Implementation of public access policies; legislative intent (a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:</p> <p>(1) Topographic and geologic site characteristics.</p> <p>(2) The capacity of the site to sustain use and at what level of intensity.</p> <p>(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.</p> <p>(a) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.</p> <p>(b) It is the intent of the Legislature that the public access policies of this article be carried out in a reasonable manner that considers the equities and that balances the rights of the individual property owner with the public's constitutional right of access pursuant to Section 4 of Article X of the California Constitution. Nothing in this section or any amendment thereto shall be construed as a limitation on the rights guaranteed to the public under Section 4 of Article X of the California Constitution.</p> <p>(c) In carrying out the public access policies of this article, the commission and any other responsible public agency shall consider and encourage the utilization of innovative access management techniques, including, but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.</p>	<p>Section 30214's intent was to recognize that there must be some limits to free and unrestrained access. Access should be made in a reasonable manner and what may be reasonable at one location may not necessarily be reasonable in the next. Wholesale free-for-all beach access in a park unit that has 3 million visitors, suggest that thoughtful consideration be given to a site's characteristics in determining what Maximum Public Access means to that specific site.</p>
<p>Section 30401 Effect on existing state agencies; construction of chapter Except as otherwise specifically provided in this division, enactment of this division does not increase, decrease, duplicate or supersede the authority of any existing state agency.</p> <p>This chapter shall not be construed to limit in any way the regulatory controls over development pursuant to Chapters 7 (commencing with Section 30600) and 8 (commencing with Section 30700), except that the commission shall not set standards or adopt regulations that duplicate regulatory controls established by any existing state agency pursuant to specific statutory requirements or authorization.</p>	<p>Section 30401 indicates that because State Parks has been granted the statutory authority to assess fees pursuant to Public Resources Code 508, that authority cannot be superseded by the California Coastal Commission pursuant to Section 30401 of the California Coastal Act .</p>

<p>Section 30404 Recommendations; agency review; reports</p> <p>(a) The commission shall periodically, in the case of the State Energy Resources Conservation and Development Commission, the State Board of Forestry and Fire Protection, the State Water Resources Control Board and the California regional water quality control boards, the State Air Resources Board and air pollution control districts and air quality management districts, the Department of Fish and Game, the Department of Parks and Recreation, the Department of Boating and Waterways, the Division of Mines and Geology and the Division of Oil, Gas, and Geothermal Resources in the Department of Conservation, and the State Lands Commission, and may, with respect to any other state agency, submit recommendations designed to encourage the state agency to carry out its functions in a manner consistent with this division. The recommendations may include proposed changes in administrative regulations, rules, and statutes.</p> <p>(b) Each of those state agencies shall review and consider the commission recommendations and shall, within six months from the date of their receipt, to the extent that the recommendations have not been implemented, report to the Governor and the Legislature its action and reasons therefor. The report shall also include the state agency's comments on any legislation that may have been proposed by the commission.</p>	<p>There have been no commission recommendations to State Parks with respect to imposition of parking fees. There was an agreement in 2013 between the then-Directors of the CCC and State Parks that discussed a collaborative approach with respect to implementing fees but State Parks has incorporated all the measures recommended therein in this proposed project.</p>

A denial of State Park's de Novo application would in fact be a repudiation of some of the most important tools authorized under the Coastal Act; that being State Park's ability to effectively manage these fragile areas from overuse.

#### **4.4. CONSISTENCY WITH THE SONOMA COAST SP GENERAL PLAN**

The Revised Fee Proposal is consistent with the Sonoma Coast SP General Plan and conforms to current and on-going management practices elsewhere in the park. The 2007 Sonoma Coast State Park General Plan, calls for the use of adaptive management techniques as a tool to achieve a balance between maximum access and resource protection. The General Plan notes that a “well-operated park unit provides for visitor safety and enjoyment, protects resource values, optimizes the utilization of the park unit’s funding and material resources, and increases the effectiveness of the staff’s efforts”. Goal ROAD-1 of the Plan includes providing parking areas that are safe and convenient and consistent with the protection of resources.

When overuse results in resource degradation, the plan calls for implementation of measures including; facility design; installation of barriers; surface treatments; area or facility closure; change in access locations, or redirection of visitors to other areas. Other methods include regulations including limiting the number of people, location or time of use (Department of Parks and Recreation, 2007). Often times parking, parking configuration and fees is a strategic tool for managing resource degradation and visitor experience related to overuse.

#### **4.5. CONSISTENCY WITH THE 2013 AGREEMENT BETWEEN STATE PARKS AND CCC**

In 2013, the then-director of State Parks, Major General Anthony Jackson, met with the then-executive director of CCC, Dr. Charles Lester, in search of an understanding on permitting issues related to self-pay stations along the coast. From that meeting, a list of approaches that State Parks should “consider” when proposing such fees was developed. To the extent that the approaches are applicable, they have been incorporated into the Revised Fee Proposal. (See Appendix H)

## **5. EXPECTED CHANGES**

The following supplemental information was requested by CCC to address various issues that may not have been borne out of State Park's internal CEQA review. Although the following information covers similar issues addressed in Appendix G of CEQA, it is not intended to be nor should it be considered a "CEQA document".

### **5.1. ESHA**

One side effect the Revised Fee Proposal will be the redistribution of some park visitors to other, less visited locations along the coast. Moreover, new signage associated with the project will help to limit illegal parking and the creation of illegal trails through sensitive habitat. One of the goals of the projects is to facilitate better management of the haphazard parking and prevent overuse of the most popular areas, where crowding inevitably leads to parking along the road shoulders and creation of volunteer trails through sensitive habitat. As noted above, peak use periods in Bodega Head and Goat Rock areas of the park realize visitation levels that far exceed the number of improved parking spaces. As a result, the existing baseline condition is visitors frequently using the shoulders for overflow parking.

The general plan for the park unit calls for the use of adaptive management techniques as a tool to achieve that balance. If overuse results in resource degradation, the plan calls for implementation of measures including: facility design; installation of barriers; surface treatments; area or facility closure; change in access locations, or redirection of visitors to other areas. Other methods include regulations including limiting the number of people, location or time of use (Department of Parks and Recreation, 2007).

Bodega Head has three paved areas providing enough space to park approximately 215 vehicles. A peak use day will see nearly 2000 vehicles pass through, and as many as 100 vehicles per hour, with the crowds far exceeding the capacity of the paved parking areas. Cars are frequently parked on the unpaved shoulders contributing to resource, degradation. There is an area of free parking along Westshore Road adjacent to Bodega Bay that will continue to remain free and may fill up before the fee areas but steep topography and the bay severely limits the ability to create additional areas of social parking.

Nevertheless, State Parks understands that some may seek out shoulder areas to avoid paying day use parking fees. As such, State Parks proposes that the CCC include a condition requiring all visitors parking at any point beyond the end of the County-maintained road, to pay either an hourly or daily fee to park. This will ensure that visitors aren't incentivized to seek out free parking at the expense of resource protection.

Shell Beach day use parking area serves as a trailhead to several popular trails including the Pomo Canyon and Redhill trails located on the east side of SR 1. On many days, vehicles are already parked along the shoulders of the entry road to the parking area to access that trail or because the lot is full. Installation of the fee collection device in this location will not induce people to park outside of the day use parking area in areas that have never seen parking, to avoid paying fees. The shoulders on SR 1 in the vicinity of the entry to Shell Beach contain

dense vegetation, roadside ditches or other topography that severely limits the ability for creation of shoulder parking.

Park users seeking to avoid paying fees are more likely to park on Furlong Court and Pacific View Drive, which are County subdivision roads that are located adjacent to this day use area. These roads are already heavily used by hikers when the parking lot is full and there are existing social trails that connect with other trails. What is more likely to occur is the subdivision road may fill up first by those seeking to avoid paying fees but they will continue to utilize the existing social trails to access the sanctioned trails. As such, there is no evidence to suggest that instituting a day use parking fee here will result in impacts to ESHAs.

The four day use parking areas at Goat Rock are located along Goat Rock Road, which is approximately 1.8 miles long from SR 1 to its terminus. The first parking area reached is Blind Beach located approximately .75 miles in from the highway while the second lot, Arched View, is located approximately 1.3 miles in. South Goat is located almost 2 miles from the entrance while North Goat is located 1.75 miles in. There are numerous turnouts and informal parking along the road and many have social trails accessing climbing areas or sanctioned trails. All of these shoulder parking areas will be full during peak use periods.

In the vicinity of the Goat Rock Road entrance at SR 1, there is one gravel turnout approximately .10 mile south but there are no other areas in the vicinity of the entrance where visitors may attempt to park so as to avoid fees because the steep terrain and dense vegetation limit opportunities to exploit for free parking. Additionally, the distance between the highway and the coast (or sanctioned trails) in this location make it less likely that visitors may attempt to park on the highway shoulder with implementation of a parking fee system. As with the other locations however, a proposed condition will require that everyone parked along Goat Rock Road will be subject to payment of the fees.

Stump Beach is located along a winding portion of SR 1 where shoulder access is limited by a steep embankment on one side of the highway and guard railing on the other side. In other locations, roadside ditches and vegetation preclude parking along the shoulder. There is a gravel area just across the highway from the Stump Beach entrance that could potentially fill up before the day use parking area but it is in a location where visitors would not be forced to create social trails to access the park.

## **5.2. PUBLIC SAFETY**

Contacted CHP and Sherriff and waiting for responses.

## **5.3. ADA ACCESSIBILITY**

Each project undertaken by State Parks must be designed and implemented to comply with the Americans with Disabilities Act. The project description in the original proposal did include a provision that included ADA accessible parking and routes between the accessible parking spaces and fee stations.

## 5.4. NATIVE AMERICAN CONSULTATION

In 2015, Assembly Bill 52 (AB52) was passed and added to the Environmental Quality Act. The addition defined “tribal cultural resources” as: sites, features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe. This new category of cultural resources must be included or determined eligible for inclusion on the California Register of Historical Resources, or a local register of historical resources. The resources must be determined by the lead agency to be significant pursuant to criteria established by PRC 5024.1.

AB52 requires that all Native American tribes, entities and individuals that have notified a State Agency in writing, to be informed of proposed projects, and have an opportunity to consult with the lead agency regarding all cultural resources including tribal cultural resources.

California State Parks practices on-going Native American consultation with two specific Native American entities in the Sonoma area, the Kashia Band of Pomo Indians of the Stewarts Point Rancheria, and the Federated Indians of Graton Rancheria. This on-going and project specific Native American consultation has failed to identify any previously recorded or identified tribal cultural resources within the project areas. However, consultation is on-going to identify all concerns that Native American entities may have regarding this proposed project.

As indicated from archival research and past and present field investigations, archaeological deposits appear not to be present in the project area of the proposed fee collection devises, upgrades and re-routes for parking or transportation will not cause an impact to previously identified archaeological resources.

Discussion - Inadvertent Finds: Given the inherent nature of archaeological deposits, often contained in subsurface deposits, there always a possibility of encountering such resources despite conducting the proper investigative work. To account for the inadvertent discovery of archaeological resources during project work, DPR will implement Specific Project Requirements Cult 1-5 and Standard Project Requirement 1, which is normal protocol for all DPR projects.

Discussion – Discovery of Human Remains: The probability of unearthing human remains during project work is low; however, in the unlikely event, such finds are uncovered, DPR will implement the protocol developed in cooperation with the Native American Heritage Commission (NAHC) to handle these discoveries. Standard Project Requirement Cult 2 is normal protocol for all DPR projects.

Native American consultation with the Kashia Band of Pomo Indians of Stewart’s Point Rancheria and the Federated Indians of Graton Rancheria, has failed to identify or indicate that any Tribal Cultural Resources are located within the proposed project area. Native American consultation is a continuous and on-going process.

## **5.5 ANTICIPATED CHANGES IN USAGE PATTERNS**

The visitation in the proposed fee areas is expected to decrease by 25% in the first years of project implementation, based on comparable fee programs implemented in other State Park locations statewide. However, attendance generally rebounded after the second year. This visitation is expected to be displaced into other non-fee areas in the park. However, this immediate outcome, will assist in addressing resource and facility impacts caused by overuse. State Parks believes that increased revenues to the District will improve the ability to maintain these high-use areas and potentially accommodate more visitors in the future.

# REPORT PREPARATION

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APPENDIX A

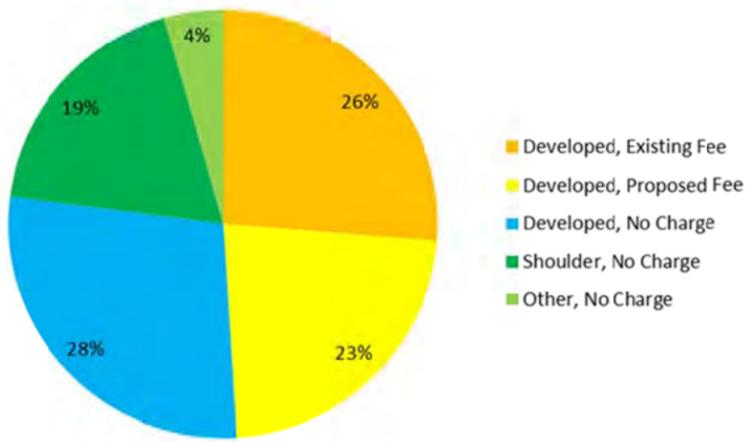
**PARKING OVERVIEW IN SONOMA COAST STATE PARK AND  
SALT POINT STATE PARK**

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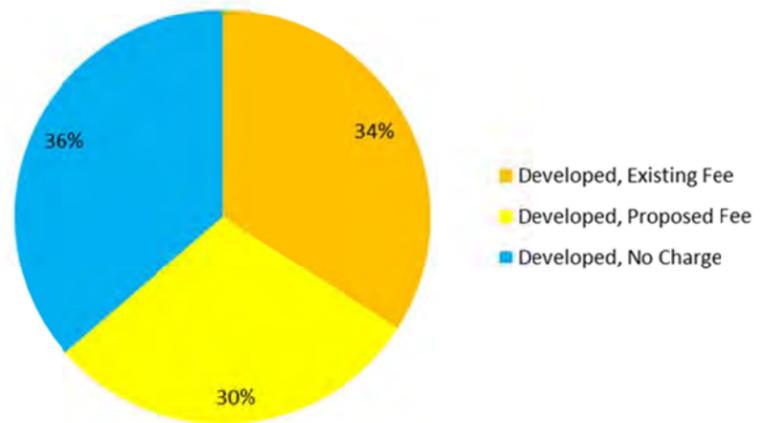
FID	Park Unit	Location	Coastal Access	Parking Type	Area	Standard (Vehicle Spaces)			Approx			Facilities	Trail Access	Trail Type	Ranger Lifeguard / Adjacent Use(s)	Existing (Fee)	Proposed (Fee)	Existing Fee (Vehicle Spaces)	Proposed Fee (Vehicle Spaces)	Notes
						Striped	ADA	ADA Oversize	Total	ADA	Oversize									
0	Sonoma Coast State Park	Bodega East		gravel	27200			100	1		101 RR, GC	designated	TH	x	x		\$	8.00		101
1	Sonoma Coast State Park	Bodega West	x	gravel	29700			90	2		92 RR, PA, GC	designated	CA, TH	x	x		\$	8.00		92
2	Sonoma Coast State Park	Gambell Cove	x	pavers	11500			25	2		27 RR, PA, GC	designated	CA	x	x		\$	8.00		
3	Sonoma Coast State Park	Carniet	x	paved	17400			57				designated	CA	x	x					Park/Residential
4	Sonoma Coast State Park	Westshore/Gaffney Point		shoulder				6				designated	TH	x						Needs access improvements/impact mitigation ESHA
5	Sonoma Coast State Park	Bay Flat		gravel	18400			20		12	32	designated	TH	x						County funded development with equestrian group. Likely DPR property and no CDP, no referral or request
6	Sonoma Coast State Park	Bodega Dunes	x	paved		x		44	4		48 RR, PA, GC	designated	CA	x	x		\$	8.00		68
7	Sonoma Coast State Park	Bear Ave./South Salmon	x	paved	15300			35	2		37 RR, GC	designated	CA	x	x					
8	Sonoma Coast State Park	North Salmon	x	paved	15900			32	3		35 RR, GC	designated	CA	x	x					
9	Sonoma Coast State Park	North Salmon #2	x	paved	2800			25				designated	CA	x	x					
10	Sonoma Coast State Park	North Salmon #3	x	shoulder				27				designated	CA	x	x					
11	Sonoma Coast State Park	Miwok	x	paved	1900			4			4	designated	CA	x	x					
12	Sonoma Coast State Park	Coleman	x	paved	10300			26				designated	CA	x	x					
13	Sonoma Coast State Park	Arched Rock	x	paved	15000			34			34	designated	CA	x	x					
14	Sonoma Coast State Park	Marshall Gulch	x	paved	7200			22			22	designated	CA	x	x					
15	Sonoma Coast State Park	Schoolhouse	x	paved	35600			77			77 RR, GC	designated	CA	x	x					
16	Sonoma Coast State Park	Portuguese	x	paved	26700			75			75 RR, GC	designated	CA	x	x					
17	Sonoma Coast State Park	Portuguese North	x	paved	5100			12			12	designated	CA	x	x					
18	Sonoma Coast State Park	Gleason 1		paved	2700			6				vista		x	x					
19	Sonoma Coast State Park	Gleason 2		paved	6000			10			10	vista		x	x					
20	Sonoma Coast State Park	Rockview		gravel	5400			8			8 PA	vista								
21	Sonoma Coast State Park	Duncans Cove South	x	paved	11300			25			25 PA	designated	CA	x	x					
22	Sonoma Coast State Park	Duncans Cove North	x	paved	4600			14			14	designated	CA	x	x					
23	Sonoma Coast State Park	Hog Back/Death Rock	x	paved	4600			20			20 PA	designated	CA	x	x					
24	Sonoma Coast State Park	Wright's Beach	x	paved	20200			60			60 RR, PA, GC	designated	CA	x	x		\$	8.00		60
25	Sonoma Coast State Park	Wright's Beach Kortum Trailhead		gravel	6800			7	1		8	designated	TH	x	x					
26	Sonoma Coast State Park	Carlavaro	x	paved	37200			40			40	designated	CA, TH	x	x					
27	Sonoma Coast State Park	Shell Beach	x	paved	35800	x		38	4		42 RR, GC	designated	CA, TH	x	x		\$	8.00		46
28	Sonoma Coast State Park	Pacific View	x	paved	29400			35			35	designated	CA	x	x					
29	Sonoma Coast State Park	Peaked Hill		shoulder				31			31	designated	TH	x	x					
30	Sonoma Coast State Park	Blind Beach	x	paved	4900			22			22 RR, GC	designated	CA	x	x		\$	8.00		22
31	Sonoma Coast State Park	South Goat Overlook		shoulder				4			4	designated	CA	x	x					
32	Sonoma Coast State Park	Arched View		paved	8600			30	2		32	designated	TH	x	x		\$	8.00		32
33	Sonoma Coast State Park	North Goat	x	paved	25100	x		72	4		76 RR, PA, GC	designated	CA	x	x		\$	8.00		68
34	Sonoma Coast State Park	South Goat	x	paved	41600			110	2		112 RR, GC	designated	CA	x	x		\$	8.00		112
35	Sonoma Coast State Park	Jenner VC	x	pavers				11	1		12 RR, PA, GC	designated	CA	x	x					Park/Commercial
36	Sonoma Coast State Park	Russian River Overlook		shoulder				25			25	vista		x	x					
37	Sonoma Coast State Park	Cat Tracks	x	shoulder				25			25	designated	CA	x	x					
38	Sonoma Coast State Park	Drijfwood Beach	x	shoulder				15			15	non-designated	CA	x	x					
39	Sonoma Coast State Park	Twin Coves		shoulder				34			34	non-designated	CA	x	x					
40	Sonoma Coast State Park	Russian Gulch		shoulder				12			12	designated		x	x					
41	Sonoma Coast State Park	Russian Gulch	x	gravel	18600			50			50 RR, PA, GC	designated	CA	x	x					Park
42	Sonoma Coast State Park	Pomo Canyon		gravel	18400			40	1		41 RR, GC	designated	TH	x			\$	8.00		
43	Sonoma Coast State Park	Willow Creek (E Camp)	x	gravel	6900			12			12 RR, GC	designated	CA	x	x		\$	8.00		
44	Sonoma Coast State Park	Vista Point		paved	5700			12	2		14 RR, PA, GC	designated	TH	x						Park
45	Sonoma Coast State Park	Willow Creek Quarry	x	shoulder				25			25	designated	CA	x	x					
46	Sonoma Coast State Park	Second Crossing Shoulder		shoulder				6			6	non-designated		x						
47	Sonoma Coast State Park	Pomo Shoulder		shoulder				15			15	designated		x						
48	Sonoma Coast State Park	Coleman Valley Rd.		shoulder				6			6	designated	TH	x						
49	Sonoma Coast State Park	Upper Willow Creek Rd.		shoulder				15			15	non-designated		x						
82	Sonoma Coast State Park	Freezeout Creek		gravel	20500			15		3	18	designated	TH	x						
50	Fort Ross State Historic Park	Cardiacs	x	shoulder				20			20	non-designated	CA	x	x					
51	Fort Ross State Historic Park	Reef	x	shoulder				15			15	non-designated	CA	x	x					
52	Fort Ross State Historic Park	Reef Terrace	x	gravel	13600			35			35	non-designated	CA	x	x		\$	8.00		35
53	Fort Ross State Historic Park	Reef Campground Day Use	x	gravel	7500			15			15 RR, GC	designated	CA, TH	x	x		\$	8.00		15
54	Fort Ross State Historic Park	Cemetery		shoulder				6			6	designated		x						
55	Fort Ross State Historic Park	Ditchbank		shoulder				6			6	designated	TH	x						
56	Fort Ross State Historic Park	Fort Ross Compound (ADA)	x	paved	1100	x		1			1 RR, PA, GC	designated	CA	x	x		\$	8.00		1
57	Fort Ross State Historic Park	Fort Ross Visitor Center	x	paved	49800	x		109	5		114 RR, PA, GC	designated	CA, TH	x	x		\$	8.00		114
58	Fort Ross State Historic Park	Old Highway One	x	paved/gravel	5000			24			24	designated	CA	x	x		\$	8.00		24
59	Fort Ross State Historic Park	Potato Patch	x	shoulder				25			25	designated	CA	x	x					
60	Fort Ross State Historic Park	Kolmer	x	shoulder				30			30	non-designated	CA	x	x					
61	Fort Ross State Historic Park	Windemere		gravel	14400			30			30	vista		x	x					
62	Salt Point State Park	South Trail		shoulder				4			4	designated	TH	x						
63	Salt Point State Park	Gerstle	x	shoulder				20			20	designated	CA, TH	x	x					
64	Salt Point State Park	Woodside	x	shoulder				6			6	designated	CA, TH	x	x					
65	Salt Point State Park	Prairie Trail		shoulder				3			3	designated	TH	x						
66	Salt Point State Park	Woodside Day Use		paved	21000			23	2		25 RR, PA, GC	designated	TH	x			\$	8.00		25
67	Salt Point State Park	Gerstle Overflow	x	pavers	21000			75			75	designated	CA, TH	x	x		\$	8.00		75
68	Salt Point State Park	Gerstle Day Use	x	pavers	31000			100	2	10	112 RR, PA, GC	designated	CA, TH	x	x		\$	8.00		112
69	Salt Point State Park	South Gerstle Day Use	x	gravel	12100			26			26 RR, PA, GC	designated	CA	x	x		\$	8.00		26
70	Salt Point State Park	Warren Creek		shoulder				8			8	non-designated		x						
71	Salt Point State Park	North Trail	x	shoulder				15			15	designated	CA, TH	x	x					
72	Salt Point State Park	Slump Beach		shoulder				15			15	designated	CA, TH	x	x					
73	Salt Point State Park	Slump Beach Day Use	x	gravel	11300			4			37 RR, PA, GC	designated	CA, TH	x	x		\$	8.00		37
74	Salt Point State Park	North Slump		shoulder				4			4	designated		x						
75	Salt Point State Park	South Fisk Mill Day Use	x	paved	10000			14	1		15 RR, PA, GC	designated	CA, TH	x	x		\$	8.00		15
76	Salt Point State Park	North Fisk Mill Day Use	x	paved	29200			12	2	17	31 RR, PA, GC	designated	CA, TH	x	x		\$	8.00		31
77	Salt Point State Park	Kruse Ranch	x	gravel	14700			25			25	designated	CA, TH	x	x					
78	Kruse Rhododendron SNR	Kruse Rhododendron		gravel	1500	x		6			6 RR, GC	designated	TH	x						Park
79	Salt Point State Park	Deadman Gulch		shoulder	1200			35			35	non-designated		x						

FID	Park Unit	Location	Coastal Access	Parking Type	Parking Area	Striped	Standard (Vehicle Spaces)	ADA	Total	Facilities	Entrance	Roa Trail Access
0	Sonoma Coast State Park	Bodega East		gravel	27200		100	1	101	RR, GC	1750'	designated
1	Sonoma Coast State Park	Bodega West	x	gravel	29700		90	2	92	RR, PA, GC		designated
27	Sonoma Coast State Park	Shell Beach	x	paved	35800	x	38	4	42	RR, GC		designated
30	Sonoma Coast State Park	Blind Beach	x	paved	4900		22		22	RR, GC		designated
32	Sonoma Coast State Park	Arched View		paved	8600		30	2	32			designated
33	Sonoma Coast State Park	North Goat	x	paved	25100	x	72	4	76	RR, PA, GC		designated
34	Sonoma Coast State Park	South Goat	x	paved	41600		110	2	112	RR, GC		designated
73	Salt Point State Park	Stump Beach Day Use	x	gravel	11300		37		37	RR, PA, GC		designated

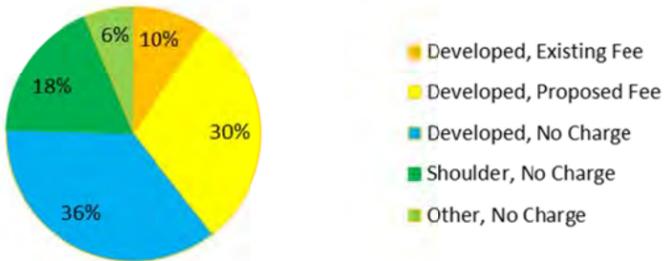
**Sonoma County Coast State Parks  
All Parking**



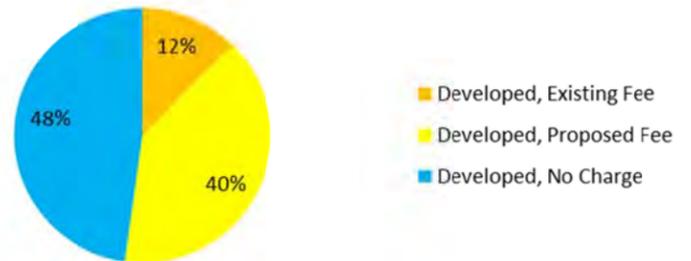
**Sonoma County Coast State Parks  
Developed Parking**



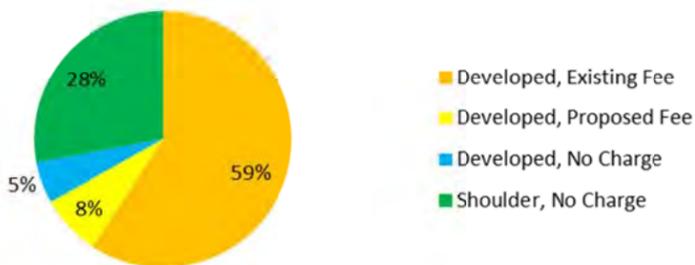
**Sonoma Coast State Park  
All Parking**



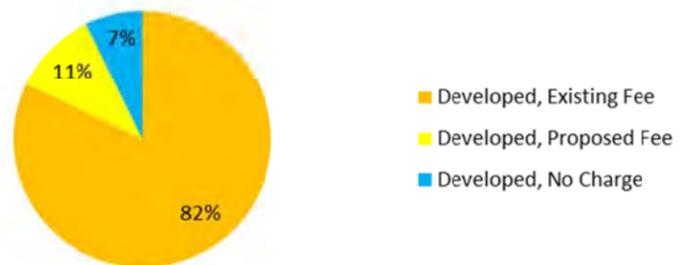
**Sonoma Coast State Park  
Developed Parking**



**Salt Point State Park  
All Parking**



**Salt Point State Park  
Developed Parking**



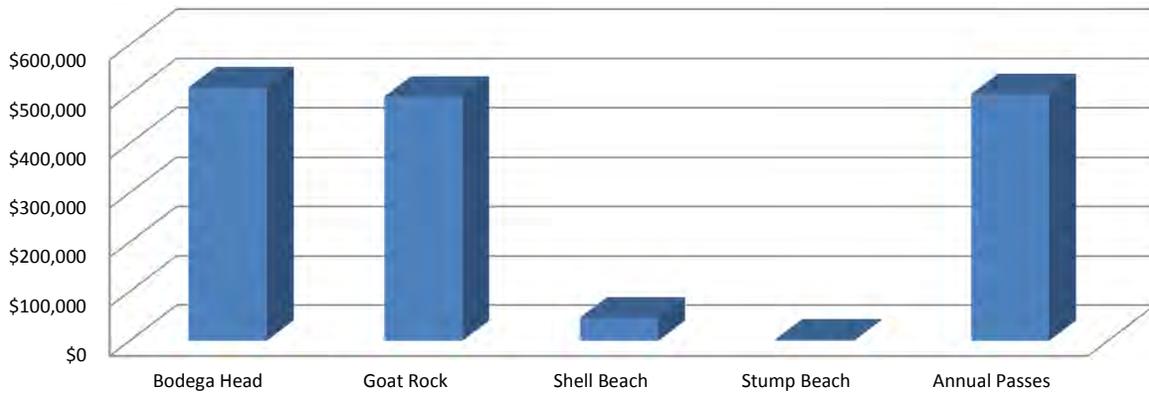
**APPENDIX B**  
**REVENUE PROJECTIONS**

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### Revenue Projections for Newly Proposed Fee Collection Areas

Location	Total Car Count	Car Count less 25% (anticipated decrease in visitation to selected area resulting from fees)	# of non-payment/turnarounds/annual passes/residents/park employees (1/3 of car count less 25% - Column C)	Day Use Projected Revenue (from Column D car count)	Projected Day Use Car Count (2/3 of total car count less 25% - Column C)	Projected Annual Day Use Revenue (Column F Car Count x \$6/car)
<b>Bodega Head</b>	171,139	128354	42,785	\$0.00	85,570	\$513,417
<b>Goat Rock</b>	164,898	123674	41,225	\$0.00	82,449	\$494,694
<b>Shell Beach</b>	15,635	11726	3,909	\$0.00	7,818	\$46,905
<b>Stump Beach</b>	1,183	887	296	\$0.00	592	\$3,549
<b>TOTAL DAY USE REVENUE</b>	<b>352,855</b>	<b>264641.25</b>	<b>88,214</b>	<b>\$0.00</b>	<b>176,428</b>	<b>\$1,058,565</b>
<b>Localized Annual Pass REVENUE</b>			10,000			\$500,000
<b>GRAND TOTAL</b>						<b>\$1,558,565</b>

### Projected Annual Day Use & Pass Revenue



Revenue Narrative Summary: Car counters were installed at the Bodega Head and Goat Rock areas on 4/18/15 and at Shell Beach on 10/27/15 and analyzed through 1/26/16 to gather raw data on car counts. Projections were used for remaining months to estimate annual car count numbers by location for Bodega Head, Goat Rock and Shell beach. Stump Beach estimated annual car count was derived using eROC revenue figures from a nearby facility (Fisk Mill), dividing by \$8, and adding 30% for a total car count. These raw car counts and estimated annual car counts were then used to project revenue. The revenue projections assume that car count visitation numbers will decline as a result of fee implementation. Based on similar implementations statewide, such as a fee increase at Orange Coast District in October 2009, it was projected that the total car count visitation number would decrease by 25%. Thus, 75% of the total car counts were used as the basis for the projected car counts upon implementation. Of these #'s, it was projected that 1/3 of the cars would not pay for a variety of reasons, including being residents, State employees, non-compliant, or passholders. It was projected that 2/3 of the cars would pay either at day use fee, projected at \$8/car or an hourly rate of \$3/hour. It was determined that the average paid rate per car would be \$6.00/car. Local Annual Pass sales were projected using 45% of Sonoma County Regional Parks total pass sales (22,000 passes) (10,000 passes x \$50/pass)

APPENDIX C  
**NOTICE OF EXEMPTION**

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State of California  
Department of Parks and Recreation

**NOTICE OF EXEMPTION**

**TO:** Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

**FROM:** Department of Parks and Recreation  
1416 Ninth Street  
P.O. Box 942896  
Sacramento, CA 94296-0001

**PROJECT TITLE:** Salt Point and Sonoma Coast State Parks Self-Pay Stations and Signs Installation

**LOCATION:** Salt Point State Park; Stump Beach. Sonoma Coast State Park; Russian Gulch, Blind Beach, Goat Rock North, Goat Rock Arched Rock, Goat Rock South, Shell Beach, Portuguese Beach, Schoolhouse Beach, Salmon Creek North, Bean Avenue, Campbell Cove, Bodega Head Upper and Bodega Head Lower.

**COUNTY:** Sonoma

**DESCRIPTION OF THE NATURE AND PURPOSE OF PROJECT:**

Install fifteen self-pay stations (iron rangers) and fee signage within Salt Point and Sonoma Coast State Parks. Installation consists of; excavation of holes (maximum 3' depth x 2' width), iron rangers set in concrete and signs posts set in crushed rock and backfilled with native soil.

**PUBLIC AGENCY APPROVING THE PROJECT:** California Department of Parks and Recreation

**NAME OF DIVISION OR DISTRICT CARRYING OUT THE PROJECT:** Russian River District

**EXEMPT STATUS:**

Categorical Exemption      Classes: 3, 4, and 11      Section: 15303, 15304, 15311

**REASONS WHY PROJECT IS EXEMPT:**

Project consists of construction and location of limited numbers of new, small facilities; minor public alterations in the condition of land and/or vegetation which do not involve the removal of healthy, mature, scenic trees except for forestry purposes; and construction or placement of minor structures accessory to (appurtenant to) existing facilities; included as "installation of signs" and "installation of fee collection devices" in the Department of Parks and Recreation's list of exempt activities in accordance with CCR

**CONTACT:** Brendan O'Neil  
Russian River District

**TELEPHONE:** (707) 865-3129  
**EMAIL:** boneil@parks.ca.gov

  
Liz Burko, District Superintendent

  
DATE

APPENDIX D  
**PUBLIC COMMENTS AND RESPONSES**

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## Sonoma Coast Fee Collection Project Comments March 2016

### RECREATION and ACCESS

#	Comment	Response
1.	Kiosk displaces parking and close access to Goat Rock	Kiosks have been eliminated from the plan under consideration at this time.
2.	Recreational activities will be compromised by traffic and fees	The number of visitors to the parks are not expected to change. Some park patrons may opt to park in day use areas that remain free of charge but there will be no increase in the number of visitors to the Parks as a result of the installation of the fee collection devices.
3.	Need photography workshops, rock climbing at Goat Rock/Stump Beach areas	This comment is outside the scope of the project.
4.	Access to marine sanctuaries is through State Parks, now that access will be limited	There will be the same number of parking spaces after the installation of the fee collection devices than there is currently. Therefore, one cannot say that access to marine sanctuaries will be any more limited than they are now.

REVENUE and FINANCIAL IMPACTS

#	Comment	Response
5.	Fees will affect low income people	There will be an ample number of free day use parking areas remaining after the fee collection devices are installed. Furthermore, fees will only be charged during peak use times. Finally, State Parks offers a pass to families qualifying under the income guidelines for a modest \$5 processing fee.
6.	Another monetary burden from already high county taxes	See response 5 above.
7.	Get off General Fund – get dedicated state funding	Comment noted. This comment acknowledges the realities that State Parks can no longer simply rely on the General Fund and must identify other sources of revenue to fund operations and programs.
8.	Make purchasing a (single) day use pass available at other locations beyond the entrance stations/collection stations (e.g., local businesses)	Comment noted. Any day use parking pass will be valid at any of the other fee day use parking areas located in Sonoma County coastal State Park units.
9.	Seek fee support from Sonoma County based on tourism \$\$ generated by State Parks	State Parks has discussed various means of obtaining County support but those discussions have not led to any agreement for funding support.
10.	Acknowledge that State Parks need funding, but other funding sources need to be found besides increasing fee areas (one specific idea mentioned was diverting gas tax funds	Comment noted.

#	Comment	Response
	from OHV to regular DPR use)	
11.	What is the cost of implementation and ongoing operating costs of the proposal?	Andy
12.	How often will fees be increased?	At this time it is impossible to anticipate when fee increases (or decreases) may occur as those decisions will be made after State Parks has an opportunity to evaluate the success of the program.
13.	How much revenue do you expect to make?	Andy
14.	Will this pave the way for more fees to be added later (in other areas)?	At this time it is impossible to anticipate if more fees (and fee locations) will be added later. Regardless, any future additional fees will likely have to be heard by the CC.
15.	Suggestion of donation boxes (voluntary payment)	Comment noted.
16.	Suggestion of "people powered parks" (Landpaths) model	Landpaths was subsidized by grant funding and with no more grant funding available, they are no longer operating Willow Creek portion of Sonoma Coast State Park. State Parks is considering a partnership model for future operational efficiencies at SCSP and other units in the system.
17.	Keep the \$ local and not adversely affect livelihood of the communities that depend on the tourism	New fee collection revenue will be used to provide improved services and facilities pursuant to PRC 5010.7(d).
18.	Encouraged group to be heard by sub-committee (budget resources committee) to get more general fund \$ back to parks	Comment noted. This is an issue that requires involvement from others outside State Parks Administration.

#	Comment	Response
19.	Unfair to charge working poor; cited the failure to provide leisure opportunity as the cause of the fall of the Roman Empire	See response 5 above.
20.	State Parks needs \$, but needs to find other ways	State Parks is simultaneously exploring internal efficiencies and maximizing partnerships with non-profits and concessions.
21.	Find other alternatives to charging fees	Comment noted. This is a larger policy issue that is beyond the scope of this project.
22.	Legislature is not doing its duty, seeing parks as commodity & pay to play	Comment noted. This is a larger policy issue that is beyond the scope of this project.
23.	Homeless population uses parks, unfair to increase fee areas	See response 5 above.
24.	Propose TOT or gas tax as potential source of funding for parks	Comment noted. This is a larger policy issue that is beyond the scope of this project.

#### AESTHETICS, LOGISTICS and PARKING IMPACTS

#	Comment	Response
25.	Kiosks and iron rangers are unsightly	Facilities will not be placed where the impact views. State Parks will be looking at methods to maximize aesthetic qualities to the extent possible.
26.	Intrinsic values - sacred wilderness value	Project is proposed only for existing developed areas and will not impact natural or cultural resources.
27.	Adding Willow Creek was not	Comment noted. Willow Creek has been removed from the proposal.

#	Comment	Response
	appropriate	
28.	Not enough information or thought has been given about the budget, expected revenue or future monitoring	Comment noted. More information regarding these issues is provided in the CCC application and State Parks will continue to provide information as it is generated.
29.	Opposition to added elements such as new paved areas	No new paving or developed areas are being proposed with this project.
30.	Sonoma Coast is incomparable, remote, secluded, locally appreciated	Comment noted.
31.	Interested in indigenous healing traditions; Bodega Head is holy ground, sacred	See response 26.

**ENVIRONMENTAL, RESOUC E PROTECTION and PERMITTING**

#	Comment	Response
32.	Are kiosks exempt from EIRs/CEQA review, or building permits?	This comment is related to kiosks which are no longer being considered at this time.
33.	How can this important issue be addressed with only a Negative Declaration?	While State Parks does acknowledge the controversy, controversy on its own is not enough to trigger an EIR if there is no substantial evidence that the project may have a significant effect on the environment. (CEQA Section 15064(f)(4))
34.	When will the comment period	Since the workshop, the kiosks/entry stations

#	Comment	Response
	for the current mitigated negative declaration begin?	are no longer being considered. Instead, fee collection devices will be installed as originally proposed and evaluated under CEQA. Therefore, no mitigated negative declaration will be prepared.
35.	Want to be certain I know of the CEQA document as soon as it is released and exactly where to find it. (Spencer Nilson, Chairperson, Sonoma Coast Surfrider Foundation)	See response 34 above.
36.	Opposition to Bodega Head as fee area specifically, due to its cultural significance	Comment noted. State Parks is aware of the significance of the area as the start of the State's environmental movement. Regardless, overuse of this area does frequently occur and the intent of the project is to minimize those occurrences.
37.	Disagreement with "pay to play" policy and viewing parks/beaches as a commodity	Comment noted. This is a larger policy issue that is beyond the scope of this project.

**PUBLIC SAFETY**

#	Comment	Response
38.	More people will park along Highway 1 to avoid parking fees – safety concerns	Parking along Highway 1 already occurs extensively. Those areas where such parking could occur already does occur under existing conditions. Most of the areas that are not now used for parking will not be used for parking in the future due to embankments, steep slopes, deep roadside ditches and dense vegetation. Additionally, numerous off-highway free parking areas will remain. As such, the introduction of parking fees to currently free areas will not result in excessive shoulder

#	Comment	Response
		parking along Highway 1.
39.	Parking north of office on Hwy. 1, posted "No Parking," is too large	No Parking is signed by California Department of Transportation along Hwy 1.
40.	Too many rangers - these "expensive" employees should be turned into the less expensive employees. (interp., maint., etc)	The number of rangers is based on operational need along the coast. Ranger staff covers 14 to 16 hours of a day.
41.	Hwy 1 parking issues - what is parks doing to mitigate impacts of vehicles along sides of road. (Cal-Trans, CHP)?	Parking along Highway 1 already occurs extensively. Those areas where such parking could occur already does occur under existing conditions. Most of the areas that are not now used for parking will not be used for parking in the future due to embankments, steep slopes, deep roadside ditches and dense vegetation. Additionally, fees will only be charged during peak use periods and numerous off-highway free parking areas will remain. As such, the introduction of parking fees to currently free areas will not result in excessive shoulder parking along Highway 1.
42.	Impact on local communities with vehicles backed-up (stacking) at entrance stations	This comment is related to kiosks which are no longer being considered at this time.
43.	Bicycle safety concerns	Implementation of the fee collection stations will have no effect on bicycle use and safety within or outside of the park.

LEGAL

#	Comment	Response
44.	Disregards Coastal Commission guidelines	The project is entirely consistent with the California Coastal Act, the Local Coastal Plan and the Sonoma Coast State Park General Plan. Nowhere in any of these documents does it suggest that fees shall not be charged for parking.
45.	The Coastal Act calls for beaches to be free to the public	The Coastal Act in fact calls for maximum public access but that does not preclude charging fees for parking. As such, the project is entirely consistent with the California Coastal Act.

COMMUNICATION and TRANSPARENCY

#	Comment	Response
46.	When is public scoping session scheduled?	There will be no public scoping session as the project (as revised) completed the CEQA process in 2012.

#	Comment	Response
47.	No opportunity for public comments at Feb. 17 meeting	Comment noted.
48.	Stakeholder input was not inclusive enough, as there were other stakeholders groups that should have been consulted, such as: community of Jenner, tribal groups, Latino and low income groups, fire departments, Sonoma County Sheriff's Office	Stakeholder Group makeup was directed by the Coastal Commission.
49.	DPR Headquarters staff have not met with Sonoma County representatives as advised by the Coastal Commission	State Parks has met with Sonoma County representatives and they in fact, were represented in the Stakeholder working group.
50.	More notice for this meeting should have been given	State Parks acknowledges the brevity in the advanced notification.
51.	Advisory Group is a good idea	Comment noted. State Parks will implement a Sonoma Coast Advisory Group on a future on-going basis to exchange information and maintain communications with the community.
52.	State Parks did not engage all stakeholders with recreational interests in process; need for public hearing	See response 48 above.
53.	Bring back advisory committee which was disbanded	See response 51 above.

RESEARCH/DATA

#	Comment	Response
54.	Lack of good budget-revenue information that warrants charging fees	48
55.	User data- counts, demographics, user analysis surveys and recreation surveys.	State Parks will be maintaining vehicle counts and may expand data collection efforts in the future to inform future park management decisions.

APPENDIX E  
**SITE PLANS**

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# CALIFORNIA DEPARTMENT OF PARKS AND RECREATION

## SONOMA-MENDOCINO DISTRICT

# SONOMA COAST STATE PARK

# FEE COLLECTION STATIONS



SONOMA-MENDOCINO DISTRICT  
 25381 STEALHEAD BLVD  
 Duncan Mills, CA  
 95430



N  
 W E S  
 REGIONAL MAP



N  
 W E S  
 LOCATION MAP



TYPICAL FEE COLLECTION STATION PHOTOGRAPHS

- C1 COVER SHEET
- L1 BODEGA HEAD (EAST) PARKING
- L2 BODEGA HEAD (WEST) PARKING
- L3 SHELL BEACH PARKING
- L4 BLIND BEACH PARKING
- L5 GOAT ROCK SOUTH PARKING
- L6 GOAT ROCK NORTH PARKING
- L7 ARCHED ROCK PARKING
- L8 STUMP BEACH PARKING

SHEET INDEX

1

GENERAL NOTES

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March 21, 2016 DPR Submittal

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CALIFORNIA STATE FIRE MARSHAL-APPROVED  
 Approval of this plan does not authorize or approve any omission of deviation from applicable regulations. Final approval is subject to field inspection. One set of approved plans shall be available on the project site at all times.  
 Reviewed by \_\_\_\_\_ Date \_\_\_\_\_  
 DPR ACCESS COMPLIANCE REVIEW ACCESSIBILITY SECTION  
 CERTIFICATION # \_\_\_\_\_  
 Reviewed by \_\_\_\_\_ Date \_\_\_\_\_  
 ACCESSIBILITY COMPLIANCE AND STATE FIRE MARSHAL SIGNED ORIGINALS FILE ONLINE AT THE DEPARTMENT OF PARKS AND RECREATION, NORTHERN SERVICE CENTER

DESIGNED: G. SHANNON  
 DRAWN: SHANNON/SPANN  
 CHECKED: SHANNON/SPANN  
 DATE: 3/1/16

REVISIONS	
DATE	

SONOMA COAST STATE PARK  
 FEE COLLECTION STATIONS  
 COVER SHEET

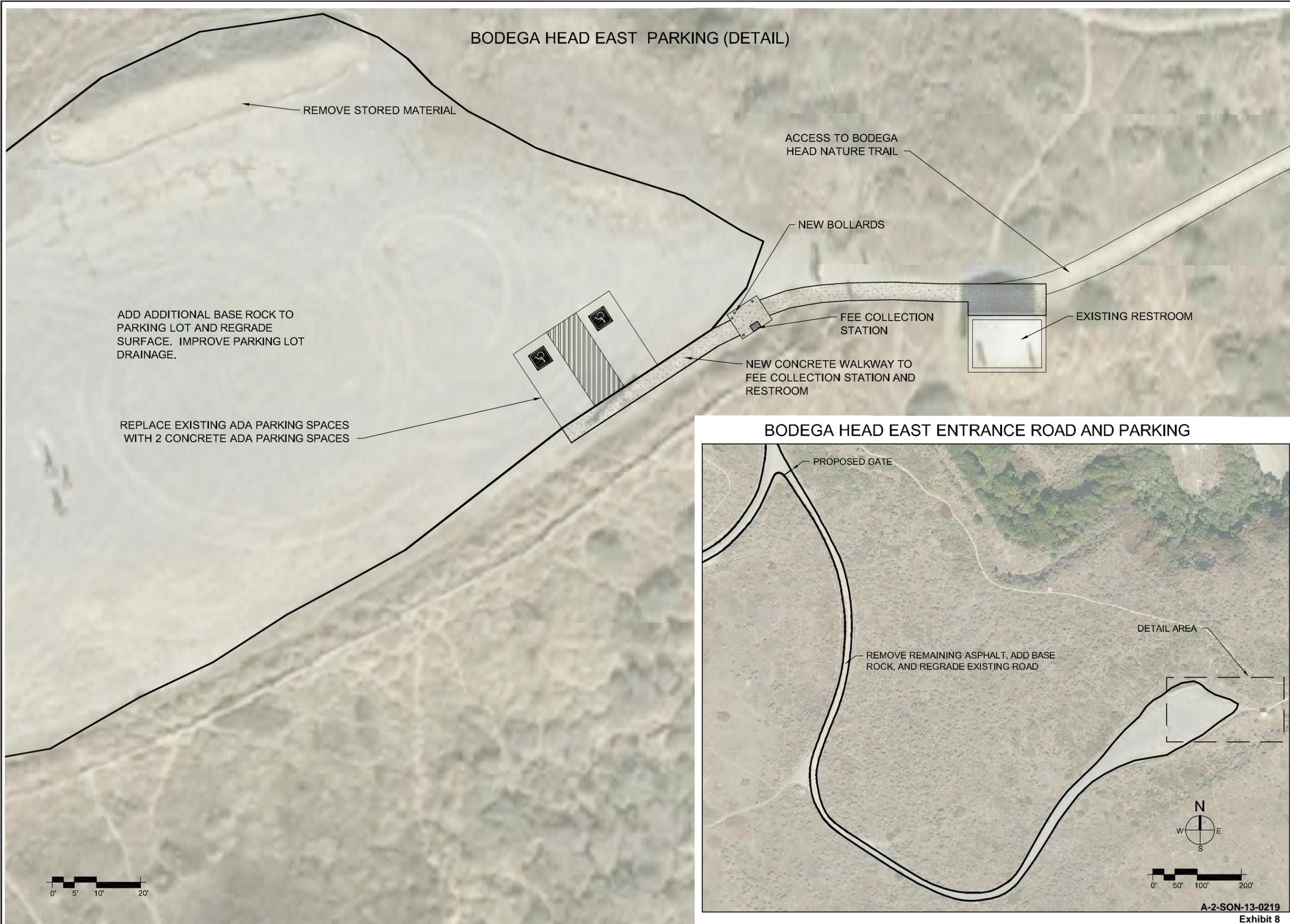
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**C1**  
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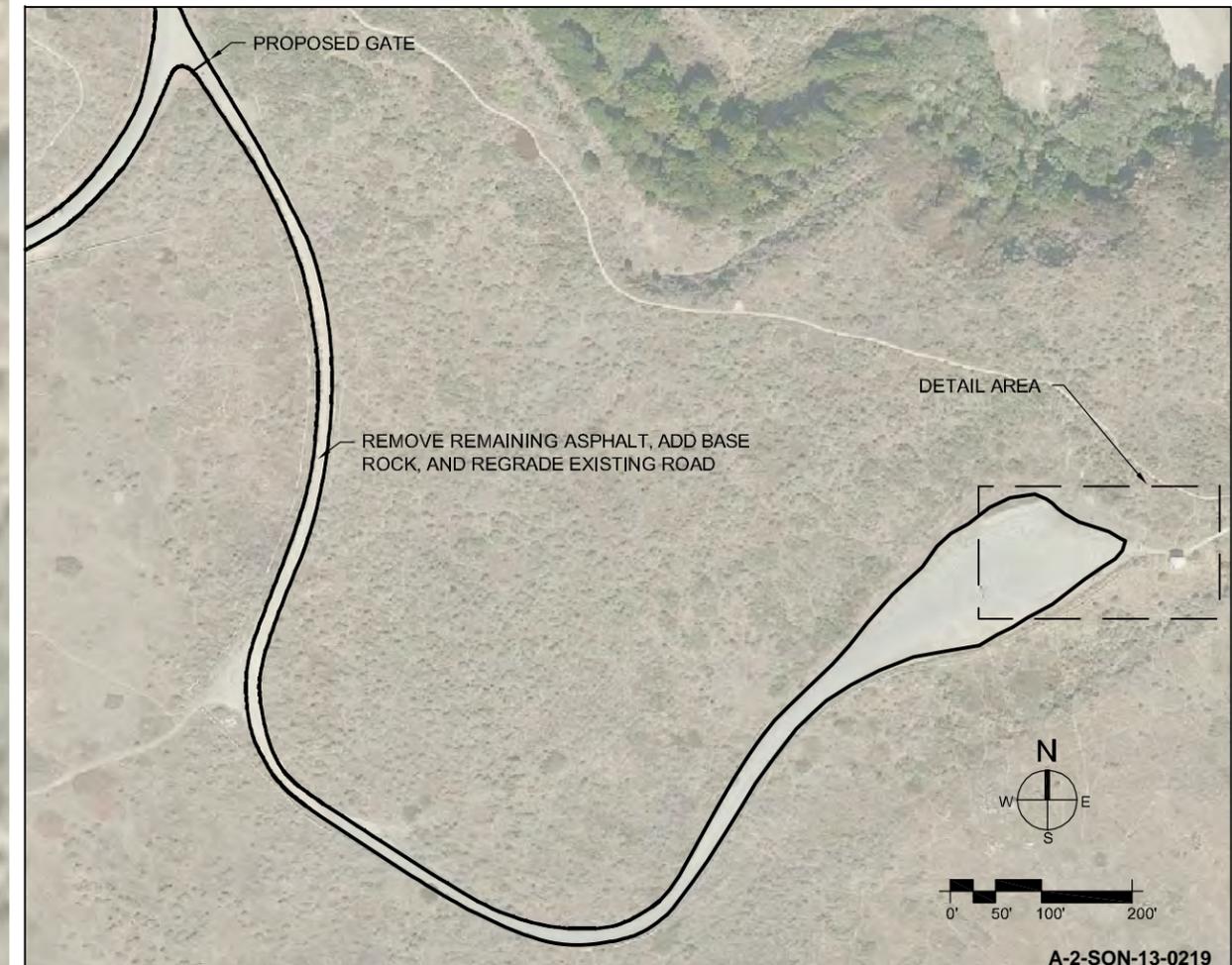


SONOMA-MENDOCINO DISTRICT  
25381 STEELHEAD BLVD  
Duncan Mills, CA 95430

### BODEGA HEAD EAST PARKING (DETAIL)



### BODEGA HEAD EAST ENTRANCE ROAD AND PARKING



CALIFORNIA STATE FIRE MARSHAL-APPROVED

Approval of this plan does not authorize or approve any omission or deviation from applicable regulations. Final approval is subject to field inspection. One set of approved plans shall be available on the project site at all times.

Reviewed by \_\_\_\_\_ Date \_\_\_\_\_

DPR ACCESS COMPLIANCE REVIEW ACCESSIBILITY SECTION

CERTIFICATION # \_\_\_\_\_

Reviewed by \_\_\_\_\_ Date \_\_\_\_\_

ACCESSIBILITY COMPLIANCE AND STATE FIRE MARSHAL SIGNED ORIGINALS ARE ON FILE AT THE DEPARTMENT OF PARKS AND RECREATION NORTHERN SERVICE CENTER

DESIGNED: G. SHANNON

DRAWN: SHANNON/SPANN

CHECKED: SHANNON/SPANN

DATE: 3/1/16

REVISIONS	
NO.	DATE

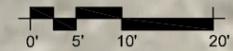
SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS  
**BODEGA HEAD PARKING (EAST)**

DRAWING NO.  
XXXXX.XXX

SHEET NO.  
**L-1**

X OF X

File: N:\Sonoma Mendocino Coast District\Russian River District\River Ranger\Access\Mapping\AutoCad\Sheet\Set\Drawings\Fee Station Base Map.dwg Layout: Bodega Head East Date: March 09 2016 12:42 pm User: jspann



A-2-SON-13-0219

Exhibit 8

March 21, 2016 DPR Submittal

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SONOMA-MENDOCINO DISTRICT  
25381 STEELHEAD BLVD  
Duncan Mills, CA  
95430

CALIFORNIA STATE FIRE MARSHAL-APPROVED  
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Reviewed by \_\_\_\_\_ Date \_\_\_\_\_  
DPR ACCESS COMPLIANCE REVIEW ACCESSIBILITY SECTION  
CERTIFICATION # \_\_\_\_\_  
Reviewed by \_\_\_\_\_ Date \_\_\_\_\_  
ACCESSIBILITY COMPLIANCE AND STATE FIRE MARSHAL SIGNED ORIGINALS ARE ON FILE AT THE DEPARTMENT OF PARKS AND RECREATION, NORTHERN SERVICE CENTER

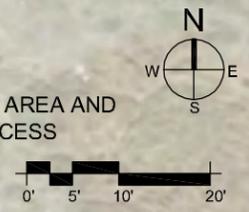
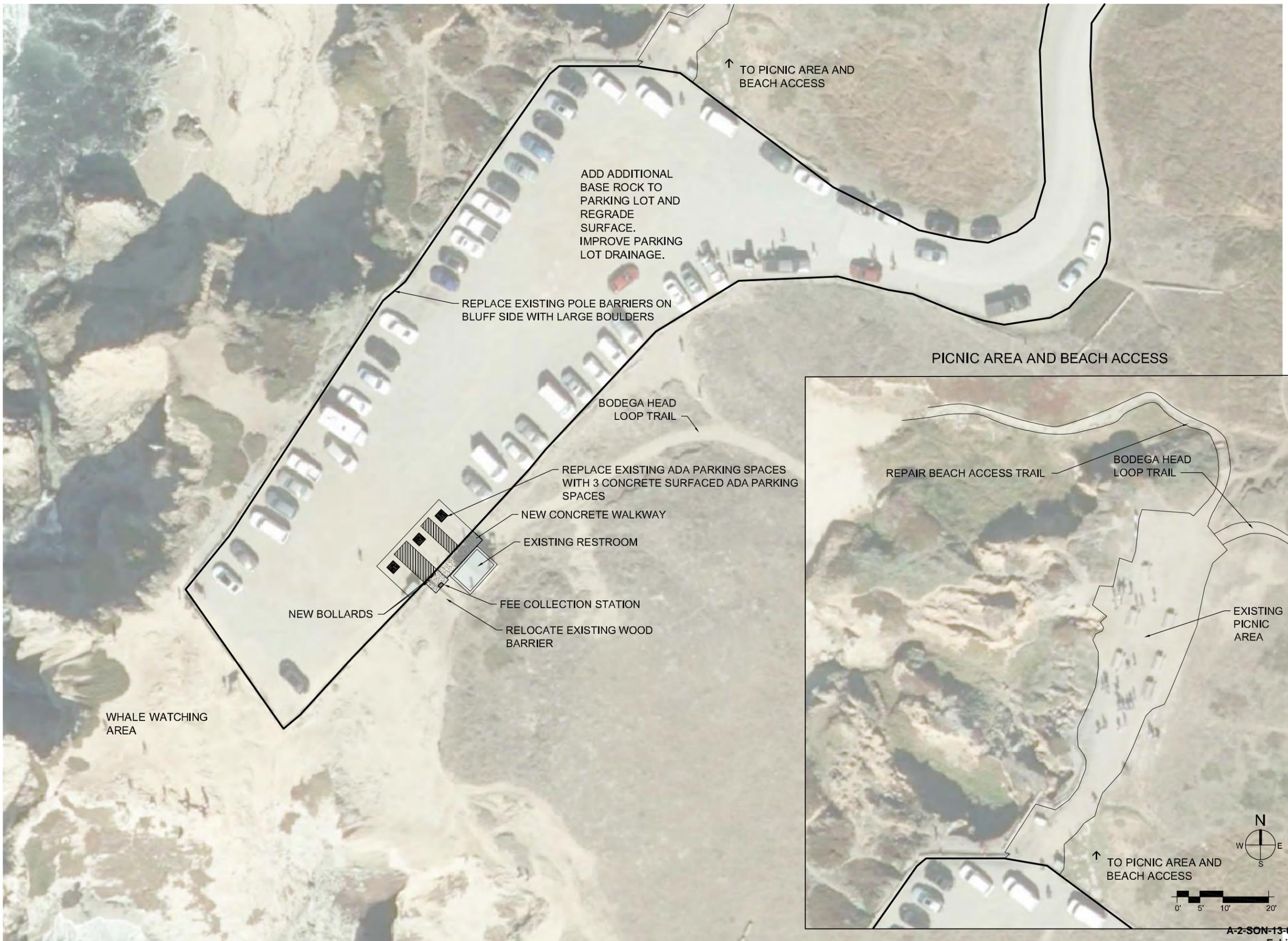
DESIGNED: G. SHANNON  
DRAWN: SHANNON/SPANN  
CHECKED: SHANNON/SPANN  
DATE: 3/1/16

REVISIONS	
NO.	DATE

SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS  
**BODEGA HEAD PARKING (WEST)**

DRAWING NO.  
XXXXX.XXX

SHEET NO.  
**L-2**  
X OF X



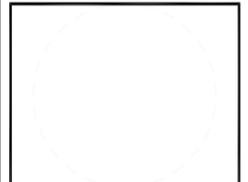
A-2-SON-13-0219  
Exhibit 8

March 21, 2016 DPR Submittal

File: N:\Sonoma Mendocino Coast District\Russian River District\Station Ranger\Appeal\Mapping\AutoCad\Sheet\Site\Drawings\Fee Station Base Map.dwg Layout: Bodega Head West Date: March 09 2016 - 2:43 pm User: jspann



SONOMA-MENDOCINO DISTRICT  
 25381 STEELHEAD BLVD  
 Duncan Mills, CA 95430



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NO.	DATE

SONOMA COAST STATE PARK  
 FEE COLLECTION STATIONS  
**SHELL BEACH PARKING**



A-2-SON-13-0219  
 Exhibit 8

DRAWING NO.  
 XXXXX.XXX

SHEET NO.  
**L-3**  
 X OF X

File: N:\Sonoma Mendocino Coast District\Russian River District\Shell Beach\Shell Beach Fee Station Base Map.dwg Layout: Shell Beach Date: March 09 2016 - 12:44 pm User: jspann



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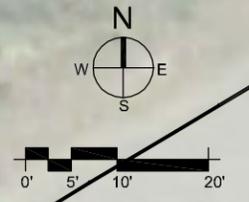
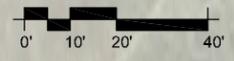
CHECKED: SHANNON/SPANN

DATE: 3/1/16

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DATE

File: N:\Sonoma Mendocino Coast District\Russian River District\ Ranger Approval\Maping\AutoCad Sheet Set\Drawings\Fee Station Base Map.dwg Layout: Blind Beach Date: March 09 2016 - 12:46 pm User: jspann



### BLIND BEACH PARKING AND FEE COLLECTION

SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS  
**BLIND BEACH PARKING**

DRAWING NO.  
XXXXX.XXX

SHEET NO.  
**L-4**  
X OF X

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Duncan Mills, CA  
95430



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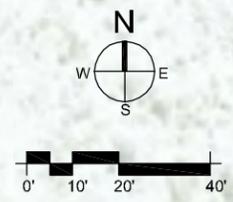
DESIGNED: G. SHANNON  
DRAWN: SHANNON/SPANN  
CHECKED: SHANNON/SPANN  
DATE: 3/1/16

REVISIONS	
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SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS  
**GOAT ROCK SOUTH PARKING**

DRAWING NO.  
XXXXXX.XXX

SHEET NO.  
**L-5**  
X OF X

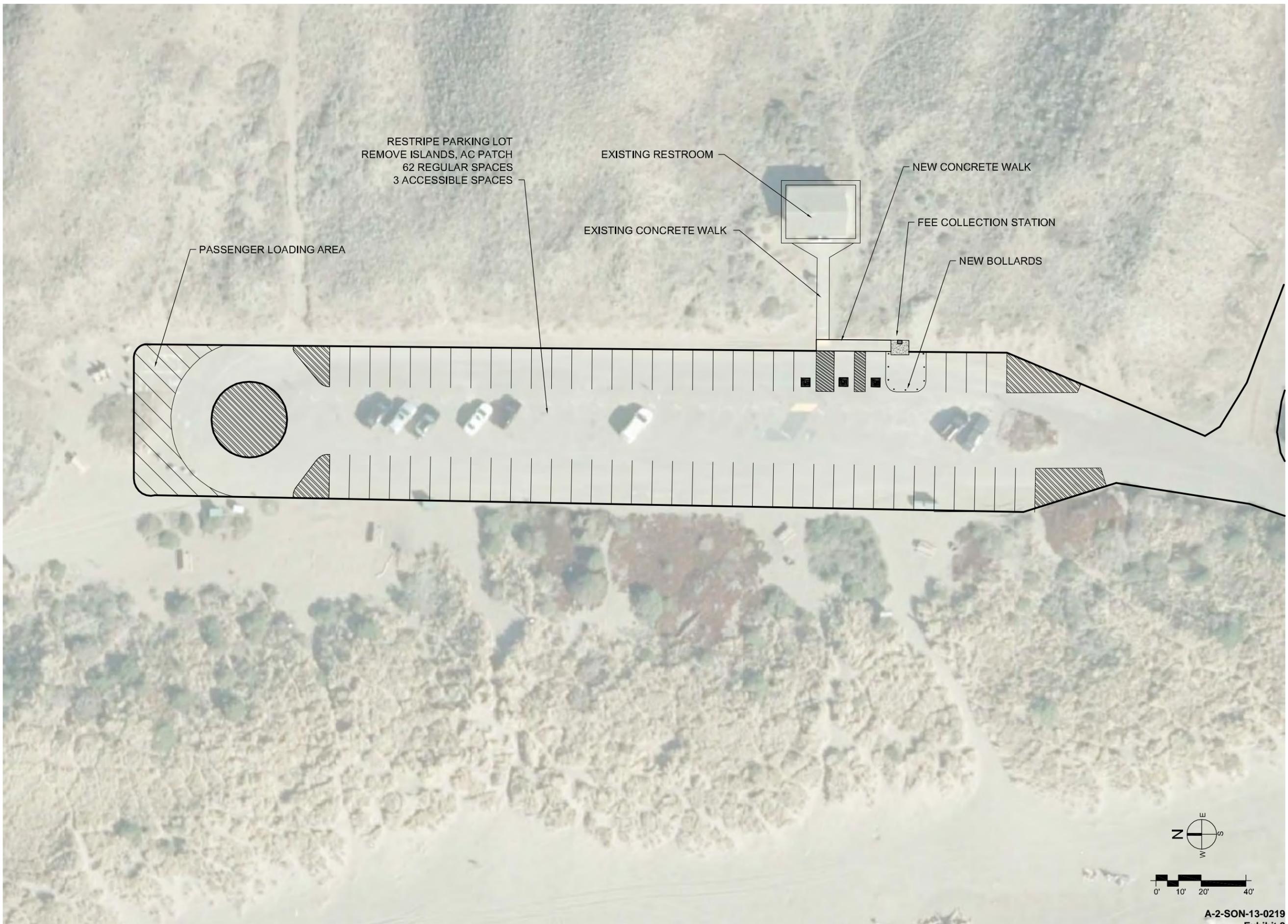


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March 21, 2016 DPR Submittal



SONOMA-MENDOCINO DISTRICT  
 25381 STEELHEAD BLVD  
 Duncan Mills, CA 95430



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REVISIONS	
NO.	DATE

SONOMA COAST STATE PARK  
 FEE COLLECTION STATIONS  
 GOAT ROCK NORTH PARKING

DRAWING NO.  
 XXXXX.XXX

SHEET NO.  
**L-6**  
 X OF X

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File: N:\Sonoma Mendocino Coast District\Russian River District\Iron Ranger\Append\Map\AutoCad Sheet\Site Drawings\Fee Station Base Map.dwg Layout: Arched Rock Date: March 09 2016 - 12:51 pm User: jspann



SONOMA-MENDOCINO  
DISTRICT  
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Duncan Mills, CA  
95430

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DPR ACCESS COMPLIANCE REVIEW  
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CERTIFICATION # \_\_\_\_\_

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MARSHAL SIGNED ORIGINALS ARE ON FILE AT  
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SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS

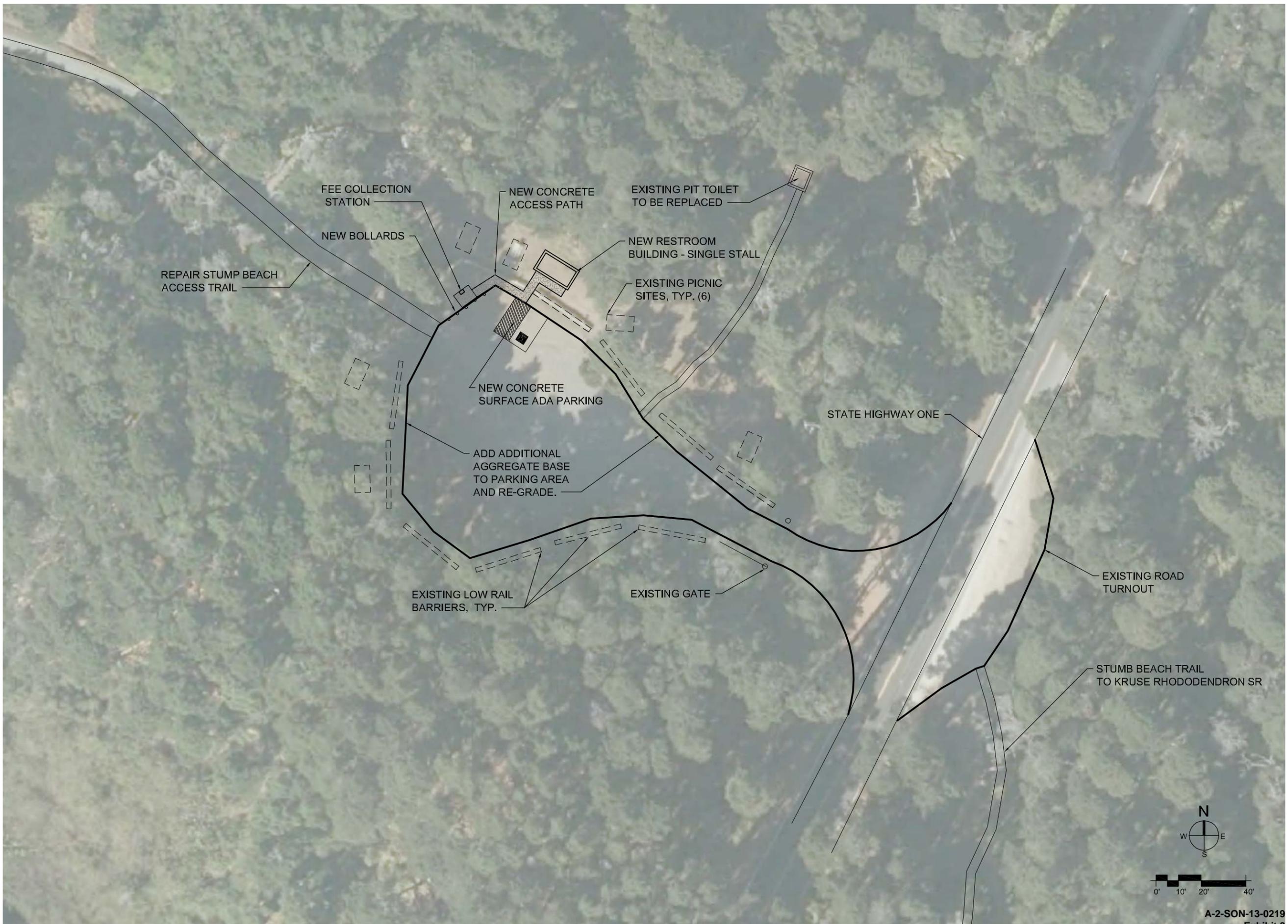
**ARCHED ROCK PARKING**

DRAWING NO.  
XXXXXX.XXX

SHEET NO.  
**L-7**  
X OF X



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 25381 STEELHEAD BLVD  
 Duncan Mills, CA 95430



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DPR ACCESS COMPLIANCE REVIEW ACCESSIBILITY SECTION CERTIFICATION # \_\_\_\_\_

Reviewed by \_\_\_\_\_ Date \_\_\_\_\_

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REVISIONS	
DATE	

SONOMA COAST STATE PARK  
 FEE COLLECTION STATIONS  
**STUMP BEACH PARKING**



A-2-SON-13-0219  
 Exhibit 8

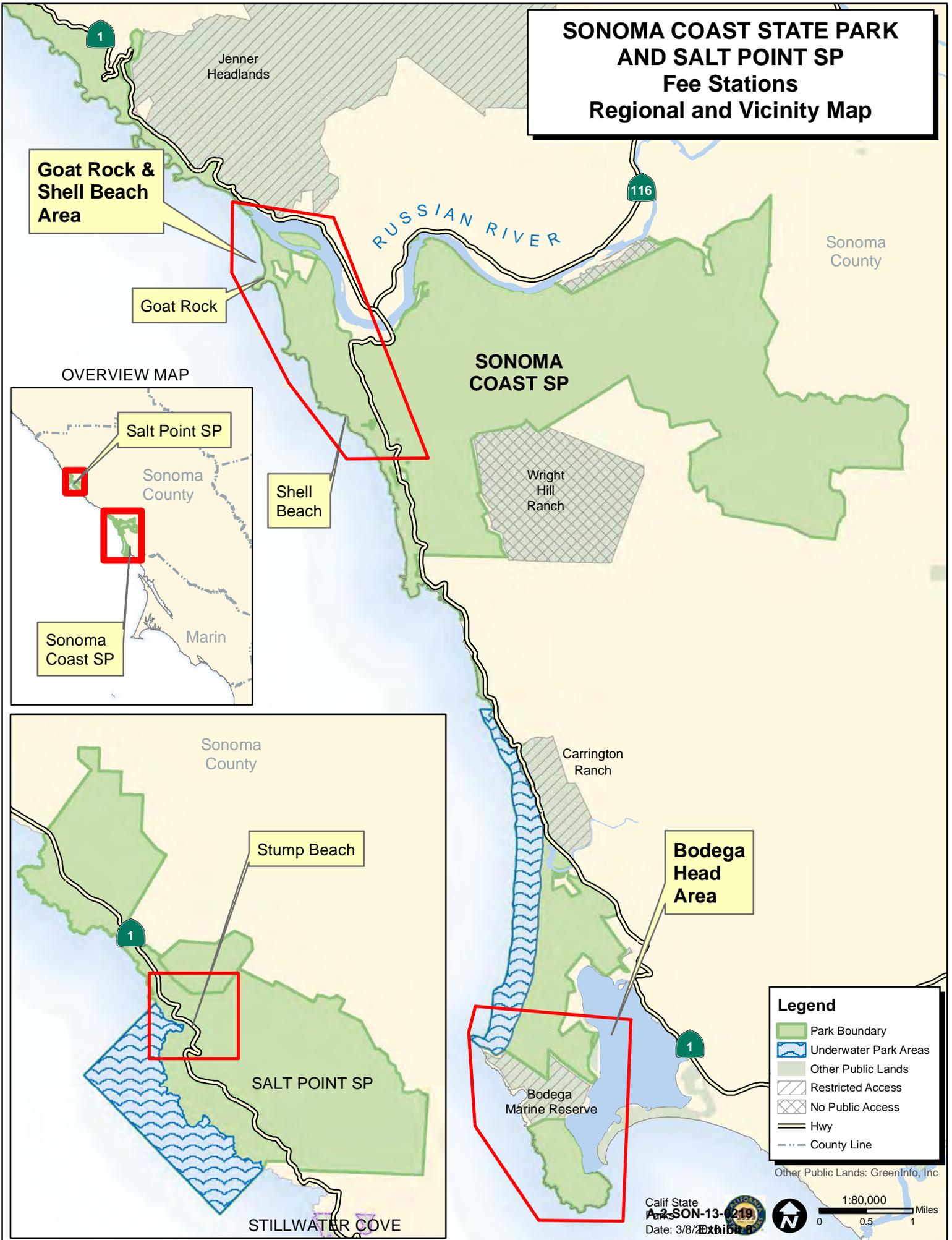
DRAWING NO. XXXXX.XXX

SHEET NO. L-8

X OF X

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# SONOMA COAST STATE PARK AND SALT POINT SP Fee Stations Regional and Vicinity Map



## OVERVIEW MAP

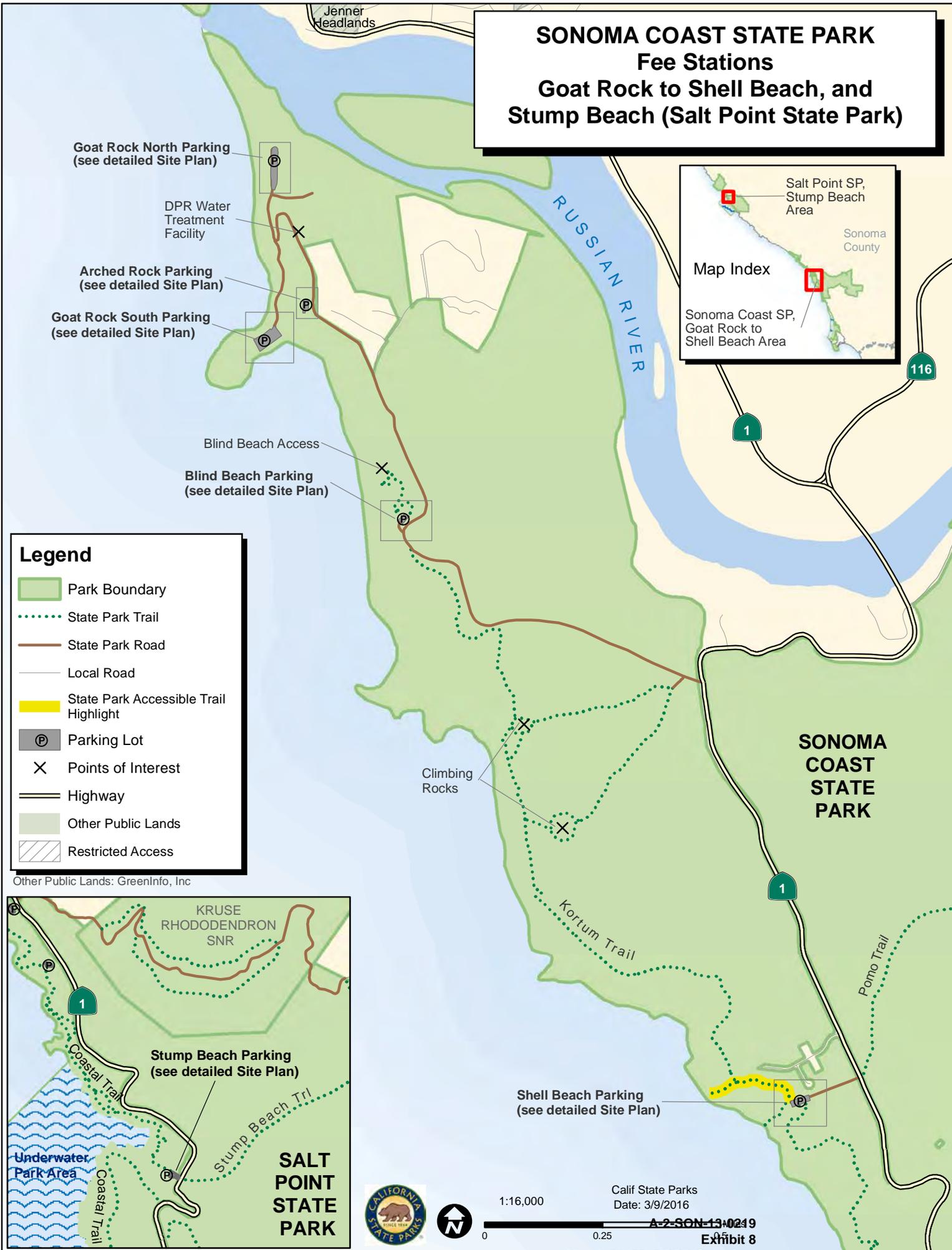


Legend	
	Park Boundary
	Underwater Park Areas
	Other Public Lands
	Restricted Access
	No Public Access
	Hwy
	County Line

Other Public Lands: GreenInfo, Inc

Calif State Parks  
**SON-13-0219**  
 Date: 3/8/2016

# SONOMA COAST STATE PARK Fee Stations Goat Rock to Shell Beach, and Stump Beach (Salt Point State Park)



Other Public Lands: GreenInfo, Inc



1:16,000



Calif State Parks  
Date: 3/9/2016

A-2-SON-13-0249

Exhibit 8

March 21, 2016 DPR Submittal

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# SONOMA COAST STATE PARK Fee Stations Bodega Head Area

## Legend

-  Park Boundary
-  Underwater Park Areas
-  Picnic Area
-  Parking Lot
-  Overlook: Landing Area with either Bench, Interpretive Panel, or both.
-  State Park Trail
-  State Park Road
-  Local Road
-  Other Agency Trail
-  Unknown
-  Other Public Lands
-  Restricted Access

Other Public Lands: GreenInfo, Inc

## Map Index



A-2-SON-13-0219  
Exhibit 8

Calif State Parks  
Date: 3/8/2016



APPENDIX F  
**ASSOCIATED PROJECTS**

---

**Sonoma Coast State Park Proposed Projects Associated with Fee Collection**

Site Location	Priority	Proposed Improvement	Original CEQA Scope (short term)	New CEQA Required (long term)		Scope Comments
			Fee Collection Related	Visitor Infrastructure Related	Visitor Amenities	
Goat Rock		Fee collection device and related site improvements	x			Locations: Blind Beach Parking, North Goat Rock Parking, South Goat Rock Parking, Arched View Parking
		Goat Rock Entrance Road Repairs		x		From Hwy 1 to Peaked Hill. Pavement failure related to drainage issues. Need engineer to assess solution.
		Blind Beach Beach Access Trail Repairs	x			need log & estimate
		Blind Beach Parking Lot re-striping & Gate	x			Existing AC surface, include ADA space and double gate.
		Blind Beach Restroom Repairs		x		Assess need
		North Goat Rock Parking Area re-configuration	x			re-design parking layout w/barriers and new striping on existing AC surface
		North Goat Rock Parking Area re-striping	x			re-design current striping configuration, add barriers, and re-stripe existing AC surface
		South Goat Rock restroom repairs		x		Assess need
		South Goat Rock Beach Access Trail Repairs		x		Assess capability to improve to ADA compliant -- need log and estimate
		Arched View Parking Lot striping	x			Stripe existing AC lot
		Rock Climber's pullout and access trail improvement			x	Formalize existing entrance road pullout to designated parking. Reroute access trail to avoid resource damage
Bodega Head		Fee collection device and related site improvements	x			Locations: West Parking Lot & East Parking Lot
		West Parking Lot resurfacing, barriers and drainage improvements	x			replace existing pole barriers on bluff side with large boulders, add base rock and regrade parking surface. Replace existing ADA parking spaces w/concrete and paved route to restroom. Drain lot inland.
		West Parking Beach Access Trail Repairs		x		need log & estimate
		Entrance Road Shoulder Repairs		x		existing AC road shoulders eroded, replace to preserve edges of AC
		West parking area whale watching platform			x	New project to protect bluff top/edge and provide improved public access & viewing area (ADA compliant)
		East Parking Lot repairs	x			remove stored debris, add base rock surfacing and regrade. Replace existing ADA parking spaces w/concrete and paved route to restroom.
		East Parking Lot access road repairs	x			remove remaining AC surfacing, add base rock and re-grade, replace gate at road intersection
		Picnic Sites Upgrades at West & East Lots		x		Assess conditions of existing. Improve access to sites or relocate. Add ADA compliant sites.
		Campbell Cove to Bodega Head connector trail			x	New project to trail connection to provide pedestrian link between Campbell Cove and upper Bodega Head
		Campbell Cove and Hole in the Head site improvements		x		Assess and reconstruct existing viewing deck including: Interp signs, boardwalk access, and chain link fencing (remove and replace w/other barrier). Improve trail access to Campbell Cove (ADA compliant if feasible).
Shell Beach		Fee collection device and related site improvements	x			
		Parking Lot re-striping	x			
		Designated Bus Parking		x		Improve entrance road shoulder (south side) to support bus parking. Base rock surfacing, barriers, and signing.
		Kortum Trail Repairs		x		Repair trail access from south side of parking lot to bridge
		Develop picnic sites (3)			x	New picnic sites w/ tables (2 regular, 1 ADA compliant)
Stump Beach		Fee collection device and related site improvements	x			
		Parking lot regrading and ADA parking	x			Regrade aggregate lot, add concrete ADA parking spaces (2) and paved path to restroom. Modify barriers as needed for restroom location
		Beach Access Trail Repairs	x			need log & estimate
		Restroom Replacement		x		Replace non-functional restroom (Shasta vault) with CXT vault restroom. Relocate new restroom adjacent to parking lot.
		Picnic Sites Modifications		x	x	Improve access, level sites, include ADA site(s) conversion.
		Develop existing well head for potable water use			x	Need to assess existing well information/condition and potential for development.
<b>Other Proposed Visitor Serving Projects That Do Not Fall Within Proposed Fee Areas</b>						
Russian Gulch		Parking lot regrading and ADA parking				regrade aggregate lot, add concrete ADA parking spaces (2) and paved path to restroom.
		Restroom Replacement				Replace non-functional restroom (Shasta vault) with CXT vault restroom.
North Salmon Creek		Symbolic fencing to protect Natural and Cultural resources				Provide improved visitor direction to trail access points. Avoid public use of fragile bluff tops.

Bean Ave.		Re-route existing beach access trail, stabilize moving dune				Existing trail through dunes problematic due to dune migration. Relocate for improved and direct public access. Stabilize impacted dune
Vista Point		Resurface trails				Existing older ADA AC loop trail needs resurfacing. Assess needs to upgrade to current ADA compliance.
Wright's blufftop		Improve parking for Kortum Trail south access				Limited existing bluff top parking. Look for alternative parking site
Unit-wide		Sign plan				
		Barriers (vehicle and pedestrian)				

Mar. 8, 2016

APPENDIX G  
**OPERATIONS AND MAINTENANCE PLAN**

---

**Operation and Maintenance Plan  
Sonoma Coast Fee Collection Proposal  
March 2016**

**Introduction**

A well-managed park balances the need to conserve natural and cultural resources with the need to provide quality outdoor recreational opportunities through sustainable maintenance and operations practices. In general, the level of maintenance necessary for sustainability varies from park to park, however, most park units require some type of annual maintenance and monitoring.

**Purpose**

The purpose of this plan is to ensure the highest quality operation and management of the state park units included in current Fee Proposal so as to ensure these areas will be maintained and operated to provide public access to California's coastline. This plan has been developed based on current best practices and standards used by California State Parks.

**Goals and Recommendations**

Goal 1

Create a maintenance program that ensures the maximum useful life of existing and future state park facilities on the Sonoma Coast.

Recommendations

- Provide adequate and well-trained park maintenance personnel.
- Ensure park administrative, management, and maintenance staff have an appropriate understanding of the scope of work necessary for sustainable park maintenance so that adequate resources can be planned, budgeted, and acquired in a timely fashion.
- Schedule facility inspections and develop work plans on a regular basis as needed (e.g., monthly, quarterly, annually) to ensure continued upkeep and repair of facilities. Plan for realistic time frames when scheduling maintenance work.
- Create and maintain a tracking system for individual park maintenance activities. Maintain all records for long-term maintenance planning and budgeting.
- Identify infrastructure that is in need of immediate repairs, upgrades, or renovation. Facilities that are essential should receive priority for corrective maintenance and repairs.
- Identify facilities that are in poor condition or are not essential and schedule for removal.

Goal 2

Strive to use sustainable park management practices whenever possible.

Recommendations

- Acquire appropriate equipment to perform maintenance effectively, efficiently, and in compliance with applicable rules and regulations.
- Utilize best practices to ensure optimal protection of natural and cultural resources.
- Ensure that staff and volunteers receive regular training regarding appropriate and sustainable maintenance and operations activities.

### Goal 3

Operate and maintain a park and its trail system in partnership with the local community.

#### Recommendations

- Solicit public input using social media and comment/suggestion boxes placed in the parks.
- Use community volunteer groups to assist in park beautification projects, e.g., restoration projects, invasive species control, installation of signage, beach clean-up, etc.
- Create volunteer recognition programs to acknowledge groups or community members for their service.
- Educate the public on park aesthetics and the benefits of sustainable park landscapes using brochures, websites, and signage.
- Provide thorough park orientation and safety training to all volunteers.
- Provide opportunities for mentoring and skill-building between park staff and volunteers.

### Goal 4

Provide a positive park experience for visitors with diverse needs and interests.

#### Recommendations

- Disseminate accurate and provocative park information using a variety of methods and languages, including but not limited to webpages, social media, printed and online brochures, cell phone apps, signage, and personal programs.
- Develop a routine maintenance and housekeeping program with the ability to adequately respond to visitor use patterns.
- Solicit public input when developing new programs and facilities.
- Gather data on visitor use patterns, needs and interests to inform future developments.
- Provide training to park staff and volunteers in customer service best practices.

### **Operations & Maintenance Requirements**

This plan identifies the general maintenance activities to be performed by park staff for the four parking areas included in the Fee Proposal.

Below is a summary of the operation and maintenance needs for each proposed location. A complete breakdown of tasks is available at the end of the document.

<b>Parking Area</b>	<b>Device Locations</b>
Goat Rock	Arched View
	Blind Beach
	South Goat Lot
	North Goat Lot
Bodega Head	Bodega West Lot
	Bodega East Lot
Shell Beach	
Stump Beach	

Sonoma Coast Operation Expenses  
Summary Totals

\$1,321,902 Sonoma Coast Sub Unit Operating Costs - Goat Rock, Shell Beach, Bodega Head and Stump Beach																					
PROGRAM	Labor Class Needed	Hours needed	Cost	Labor Class Needed	Hours needed	Cost	Labor Class Needed	Hours needed	Cost	Labor Class Needed	Hours needed	Cost	Labor Class Needed	Hours needed	Cost	Labor Class Needed	Hours needed	Cost	Materials/Contract	Equipment	Program Total Cost
<b>Natural Resources Management</b> includes cultural support	ENVIRONMENTAL SCIENTIST	231	\$11,707	SKILLED LABORER	514	\$15,523	LABORER	672	\$17,801										\$5,934	\$1,847	\$52,812
<b>Facilities and Housekeeping</b> includes cultural support	SEAS MAINT AID	1371	\$23,307	SEAS SR MAINT AID	444	\$8,436	PMA	362	\$9,589	PMW I	432	\$13,678	MAINTENANCE MECHANIC	340	\$14,224	SP EQPT OPERATOR	263	\$10,207	\$211,416	\$28,783	\$319,640
<b>Interpretation and Education</b>	SP INTERP I	320	\$9,046	SEAS PARK INTERP SPEC	420	\$8,820	SPPO (RANGER)	240	\$11,105										\$575	\$-	\$29,547
<b>Public Safety and Fee Collection</b>	SEAS LG I	15872	\$365,056	SPPO (LIFEGUARD)	2920	\$135,108	SPPO (RANGER)	6192	\$286,504	SEAS SENIOR PARK AID	3406	\$64,705							\$-	\$-	\$851,373
<b>Cultural Resources Management</b>	ASSOC STATE ARCHEO	315	\$11,744	STATE HIST II	64	\$3,099	ASST STATE ARCHEOLOGIST	65	\$2,408	SENIOR STATE ARCHEOLOGIST	12	\$678	SEAS ARCHEO PROJ LEADER	6	\$153	Principle Mechanical and Electrical	16	\$1,199	\$49,250	\$-	\$68,530

Goat Rock Areas (Arched View, Blind Beach, South Goat Lot, North Goat Lot)

Fee collection operational issues will be handled primarily by seasonal visitor services staff (Park Aides and Senior Park Aides), with support and supervision provided by State Park Peace Officers(R)'s and SPPOS(R)'s. The reporting location for staff is Salmon Creek Ranger Station, which is a 40 minute round-trip drive from the Goat Rock Area. The four proposed pay devices in this area will be checked routinely by seasonal visitor services staff to collect cash, credit and visitation data, restock ticket and receipt paper and ensure devices are fully functioning. Cash collected will be brought to the Salmon Creek Ranger Station for processing.

Routine housekeeping, and grounds and facility maintenance will be handled by seasonal maintenance staff (Park Aides or Maintenance Aides), with support and supervision provided by PMWI's and the PMS. Restroom stalls (eight total), trash cans (10 total), recycling bins (nine total) and the immediate grounds in these areas will be serviced by seasonal maintenance staff. Other grounds and landscaping maintenance items will be conducted on a cyclical basis.

The Arched View area serves the northern portion of the Kortum Trail. Routine trail maintenance for this area and the Blind Beach Access Trail will be handled by both permanent (PMWI, SL) and seasonal maintenance staff (SPA, MA), and supplemented through community projects and the Volunteers in Parks program.

The Blind Beach Lot, which has been closed seasonally for several years due to staffing shortages and cost saving measures, will be re-opened year-round as a result of the proposed fees. Opening this lot is anticipated to increase the need for law enforcement patrol and calls for service from park's public safety staff. Opening this lot is also anticipated to increase costs for septic pumping, trash disposal, housekeeping supplies, and general facility maintenance due to increased use by the public.

**Goat Rock Operaton Expenses**

PROGRAM		TASKS	PRIMARY MEANS OF IMPLEMENTATION											Materials	Equipment
Program	Program Subcatagory	Operational Task	Labor Classification(s) Needed												
			1		2		3		4		5				
			Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed			
Natural		Exotic Plant Control	ENVIRONMENTAL SCIENTIST	65.5	SKILLED LABORER	148	LABORER	244					\$1,960.00	\$599.76	
Natural		Vegetation - Succession Mgmt.	ENVIRONMENTAL SCIENTIST	1.5	SKILLED LABORER	8							\$40.00	\$12.24	
Natural		Annual Inspection	ENVIRONMENTAL SCIENTIST	27									\$24.00	\$11.28	
				<b>94</b>		<b>156</b>		<b>244</b>					<b>\$2,024.00</b>	<b>\$623.28</b>	
Facilities	Buildings	Plumbing Maintenance & Repair (includes	MAINTENANCE MECHANIC	16	PMW I	16							\$498.49	\$55.00	
Facilities	Buildings	Painting - Interior	PMA	8	SEAS MAINT AID	8							\$95.00	\$55.00	
Facilities	Buildings	Painting - Touch Up	PMA	4									\$35.00	\$30.98	
Facilities	Buildings	Roof Coverings - Maintenance & Repair	PMW I	8									\$150.00	\$27.20	
Facilities	Buildings	Carpentry	PMW I	8									\$100.00	\$90.70	
Facilities	Buildings	Window Maintenance & Repair	PMW I	16									\$150.00	\$30.98	
Facilities	Buildings	Door & Lock Maintenance	MAINTENANCE MECHANIC	24									\$849.56	\$15.25	
Facilities	Systems	Electrical Maintenance & Repair	MAINTENANCE MECHANIC	16									\$146.29	\$85.20	
Facilities	Systems	Water Distribution System Repair	MAINTENANCE MECHANIC	40									\$1,500.00	\$268.00	
Facilities	Systems	Water System - Treatment & Inspection	MAINTENANCE MECHANIC	150	WATER AND SEWAGE	192							\$3,885.30	\$297.98	
Facilities	Buildings	Vault Toilet Pumping	CONTRACTED LABOR										\$2,520.00		
Facilities	Buildings, Misc. Structures	Vandalism	MAINTENANCE MECHANIC	16	PMW I	24	SEAS MAINT AID	24					\$500.00	\$85.20	
Facilities	Grounds	Mowing	PMA	40	SEAS MAINT AID	40								\$285.00	
Facilities	Grounds	Weeding	PMA	40	SEAS MAINT AID	40								\$50.00	
Facilities	Housekeeping	Garbage Pick Up	CONTRACTED LABOR										\$2,933.55		
Facilities	Housekeeping	Clean Comfort Station, Vault Toilet, Pogyging	SEAS SR MAINT AID	283	SEAS MAINT AID	283							\$500.00	\$125.00	
Facilities	Misc. Structures	Day Use Furniture Maintenance	PMW I	8									\$606.40	\$68.69	
Facilities	Misc. Structures	Gate Maint. & Repair	PMW I	4	SEAS MAINT AID	4							\$533.00	\$21.15	
Facilities	Housekeeping	Fire Extinguisher Monthly/Annual Service	SEAS SR MAINT AID	1										\$6.78	
Facilities	Misc. Structures	Fencing Maint. & Repair	PMW I	8	SEAS MAINT AID	8	SP EQPT OPERATOR	8					\$1,650.00	\$42.90	

Goat Rock Operaton Expenses

PROGRAM		TASKS	PRIMARY MEANS OF IMPLEMENTATION										Materials	Equipment
Program	Program Subcatagory	Operational Task	Labor Classification(s) Needed											
			1		2		3		4		5			
			Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed		
Facilities	Roads	Asphalt Road and Parking Maintenance	SP EQPT OPERATOR	51.41	PMW I	43.7	PMA	51					\$89,593.48	\$7,449.48
				<b>355.41</b>		<b>658.7</b>		<b>83</b>					<b>\$106,246.07</b>	<b>\$9,090.49</b>
Interpretation and Education	Park Interpretation	Roving Interpretation	SP INTERP I	80	SEAS PARK INTERP SPEC	105	SPPO (RANGER)	80					\$143.87	
				<b>80</b>		<b>105</b>		<b>80</b>					<b>\$143.87</b>	
Public Safety - Aquatics	Lifeguard Operations - Shift Work	Vehicle Patrol - Patrol Beaches using Seasonal and Permanent Lifeguards	SEAS LG I	3224	SEAS LG II	744								
Public Safety - Law Enforcement	Patrol	Patrol - SPPO Lifeguard	SPPO (LIFEGUARD)	730										
Public Safety - Law Enforcement	Patrol	Patrol - SPPO Ranger	SPPO (RANGER)	1460										
Public Safety - Law Enforcement	Patrol	Patrol - SPPO Ranger	SPPO (RANGER)	88										
Recreational Svcs (Day Use and Overnight)	APM Operation (4 APMS)	APM Daily Maintenance Housingkeepng and Fee Collection	SEAS SENIOR PARK AID	505										
Recreational Svcs (Day Use and Overnight)	APM Operation (4 APMS)	Public Interaction	SEAS SENIOR PARK AID	547.5										
				<b>6554.5</b>		<b>744</b>							<b>\$-</b>	
Cultural	Archaeology	Present talks on current archaeological research	ASSOC STATE ARCHEO	16										
Cultural	Archaeology	Conduct communications with	ASSOC STATE ARCHEO	50										
Cultural	Archaeology	Conduct archaeological site inspections	ASSOC STATE ARCHEO	6.25	ASST STATE ARCHEOLOG	6.25								
Cultural	Archaeology	Complete DPR 523 Series form updates and	ASSOC STATE ARCHEO	6.25	ASST STATE ARCHEOLOG	6.25								
Cultural	Archaeology	Conduct archaeological site protection based	ASSOC STATE ARCHEO	2.5	PMW I	4	ENVIRONMENTAL SCIENTIST	4	SENIOR STATE	4	Principle Mechanical	4	\$6,250.00	
Cultural	Archaeology	Update unit data file to include current	ASSOC STATE ARCHEO	2	ASST STATE ARCHEOLOG	2								
Cultural	Archaeology	Prepare Annual PRC 5024 Activities Report for	ASSOC STATE ARCHEO	2	ASST STATE ARCHEOLOG	2								
Cultural	Archaeology	Review and update cultural GIS to reflect current archaeological	ASSOC STATE ARCHEO	1.5	RESRCH ANA I - GIS	1.5	ASST STATE ARCHEOLOG	1.5	SEAS ARCHEO	1.5				
Cultural	Historical	Site Condition Assessment - Level 1	STATE HIST II	7.5										
Cultural	Historical	Complete DPR 523 series forms for	STATE HIST II	3										

**Goat Rock Operaton Expenses**

PROGRAM		TASKS	PRIMARY MEANS OF IMPLEMENTATION										Materials	Equipment
Program	Program Subcatagory	Operational Task	Labor Classification(s) Needed											
			1		2		3		4		5			
			Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed		
Cultural	Historical	Conduct historical site protection based upon	STATE HIST II	3	PMW I	3	MAINTENANCE MECHANIC	3					\$6,250.00	
				100		25		8.5		5.5		4	\$12,500.00	

### Bodega Head Areas (Bodega West Lot, Bodega East Lot)

Fee collection operational issues will be handled primarily by seasonal visitor services staff (Park Aides and Senior Park Aides), with support and supervision provided by SPPO(R)'s and SPPOS(R)'s. The reporting location for staff is Salmon Creek Ranger Station, which is a 20 minute round-trip drive from the Bodega Head area. The two proposed fee collection devices in this area will be checked routinely by seasonal visitor services staff to collect cash, credit and visitation data, restock receipt and ticket paper and ensure devices are fully functioning. Field collections will be brought to the Salmon Creek Ranger Station for processing.

Routine housekeeping and maintenance activities will be handled by seasonal maintenance staff (Park Aides or Maintenance Aides), with support and supervision provided by PMWI's and the PMS. The restroom stalls (four total), trash cans (six total), recycling bins (three total) and the immediate grounds in these areas will be serviced by seasonal maintenance staff. Other grounds and landscaping maintenance will be conducted on a cyclical basis.

This area serves the Bodega Head and Overlook Trails. Routine trail maintenance for the trails on Bodega Head will be handled by both permanent maintenance staff (PMWI, SL) and seasonal maintenance staff (SPA, MA), and supplemented through community projects and the Volunteers in Parks program.

The Bodega Head East Lot, which has been closed for several years due to staffing shortages and cost saving measures, will be re-opened year-round as a result of the proposed fees. Re-opening this lot is anticipated to increase the need for law enforcement patrol and calls for service from park's public safety staff. Re-opening this lot is also anticipated to increase costs for septic pumping, trash disposal services, housekeeping supplies, and general facility maintenance due to increased use by the public.

**Bodega Head Operation Expenses**

#	PROGRAM		TASKS	PRIMARY MEANS OF IMPLEMENTATION										Materials	Equipment	
	Program	Program Subcategory	Operational Task	Labor Classification(s) Needed												
				1		2		3		4		5				
				Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed			
1	Natural		Exotic Plant Control	ENVIRONMENTAL SCIENTIST	89	SKILLED LABORER	220	LABORER	300						\$2,600.00	\$795.60
2	Natural		Vegetation - Succession Mgmt.	ENVIRONMENTAL SCIENTIST	4.5	SKILLED LABORER	22								\$120.00	\$58.14
3	Natural		Management Unit Annual Inspection	ENVIRONMENTAL SCIENTIST	12										\$10.00	\$4.70
4	Natural		Hunt Non-Native Animal	ENVIRONMENTAL SCIENTIST	2	SKILLED LABORER	12								\$10.00	\$5.88
5					107.5		254		300						\$2,740.00	\$864.32
6																
7	Facilities	Buildings	Plumbing Maintenance & Repair (includes	MAINTENANCE MECHANIC	16	PMW I	16								\$659.03	
8	Facilities	Buildings	Painting - Interior/Exterior	PMA	24	SEAS MAINT AID	24								\$155.00	\$110.00
9	Facilities	Buildings	Painting - Touch Up	PMA	4	SEAS MAINT AID	4								\$40.00	\$30.98
10	Facilities	Buildings	Window Maintenance & Repair	PMW I	16										\$150.00	\$30.98
11	Facilities	Buildings	Door & Lock Maintenance	MAINTENANCE MECHANIC	16	PMW I	16								\$1,415.93	\$15.25
12	Facilities	Buildings, Misc. Structures	Vandalism	MAINTENANCE MECHANIC	24	PMW I	24	SEAS MAINT AID	24						\$500.00	\$85.20
13	Facilities	Grounds	Mowing	PMA	40	SEAS MAINT AID	40									\$285.00
14	Facilities	Grounds	Weeding	PMA	40	SEAS MAINT AID	40									\$42.00
15	Facilities	Housekeeping	Garbage Pick Up	CONTRACTED LABOR											\$1,173.41	
16	Facilities	Buildings	Vault Toilet Pumping	CONTRACTED LABOR											\$4,550.00	
17	Facilities	Misc. Structures	Gate Maint. & Repair	PMW I	8	SEAS MAINT AID	8								\$250.00	
18	Facilities	Housekeeping	Vault Toilet and Use Area Housekeeping,	PMA	100	SEAS MAINT AID	400	SEAS SR MAINT AID	400						\$500.00	\$125.00
19	Facilities	Trails	Annual Trail Maintenance	PMW I	90	CONTRACTE D LABOR	428.79								\$10,857.84	\$2,668.00
20	Facilities	Misc. Structures	Day Use Furniture Maintenance	PMW I	8										\$558.13	\$68.69
21	Facilities	Roads	Asphalt Road and Parking Maintenance	SP EQPT OPERATOR	30	PMW I	16	PMA	30						\$48,336.00	\$3,724.74
22	Facilities	Roads	Gravel/Native Material Parking Lot	SP EQPT OPERATOR	80	SEAS MAINT AID	80								\$13,863.00	\$7,695.00
23	Facilities	Roads	Barricade Maintenance	SP EQPT OPERATOR	10	SEAS MAINT AID	10								\$1,462.60	\$450.00
24					613.5		1360.79		754						\$87,210.94	\$16,195.16
25																
26	Interpretation and Education	Park Interpretation	Roving Interpretation	SP INTERP I	80	SEAS PARK INTERP SPEC	105	SPPO (RANGER)	80						\$143.87	

**Bodega Head Operation Expenses**

#	PROGRAM		TASKS	PRIMARY MEANS OF IMPLEMENTATION										Materials	Equipment		
	Program	Program Subcategory	Operational Task	Labor Classification(s) Needed													
				1		2		3		4		5					
				Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed				
27					80		105		80						\$143.87		
28																	
29	Public Safety - Aquatics	Lifeguard Operations - Shift Work	Vehicle Patrol - Patrol Beaches using Seasonal and Permanent Lifeguards	SEAS LG I	3224	SEAS LG II	744	SPPO (LIFEGUARD)									
30	Public Safety - Law Enforcement	Patrol	Patrol - SPPO Lifeguard	SPPO (LIFEGUARD)	730												
31	Public Safety - Law Enforcement	Patrol	Patrol - SPPO Ranger	SPPO (RANGER)	1460												
32	Public Safety - Law Enforcement	Patrol	Patrol - SPPO Ranger	SPPO (RANGER)	88												
33	Recreational Svcs (Day Use and Overnight Measurement)	APM Operation (2 APMS)	APM Daily Maintenance Housingkeeping and Fee Collection	SEAS SENIOR PARK AID	450												
34	Recreational Svcs (Day Use and Overnight Measurement)	APM Operation (1 APMS)	Public Interaction	SEAS SENIOR PARK AID	547.5												
35					6499.5		744								\$-		
36																	
37	Cultural	Archaeology	Present talks on current archaeological research and planning	ASSOC STATE ARCHEO	9.6												
38	Cultural	Archaeology	Conduct communications with tribal communities	ASSOC STATE ARCHEO	30												
39	Cultural	Archaeology	Conduct archaeological site inspections	ASSOC STATE ARCHEO	3.75	ASST STATE ARCHEOLOGIST	3.75										
40	Cultural	Archaeology	Complete DPR 523 Series form updates and mapping for recorded archaeological sites - Level 1	ASSOC STATE ARCHEO	3.75	ASST STATE ARCHEOLOGIST	3.75										
41	Cultural	Archaeology	Conduct archaeological site protection based upon assessment findings - Level 1	ASSOC STATE ARCHEO	1.5	PMW I	2.4	ENVIRONMENTAL SCIENTIST	2.4	SENIOR STATE ARCHEOLOGIST	2.4	Principle Mechanical and Electrical Engineer	2.4	\$3,675.00			
42	Cultural	Archaeology	Update unit data file to include current archaeological resource documentation	ASSOC STATE ARCHEO	1.2	ASST STATE ARCHEOLOGIST	1.2										

Bodega Head Operation Expenses

#	PROGRAM		TASKS		PRIMARY MEANS OF IMPLEMENTATION								Materials	Equipment	
	Program	Program Subcategory	Operational Task	Labor Classification(s) Needed											
				1		2		3		4		5			
				Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed			Hours needed
43	Cultural	Archaeology	Prepare Annual PRC 5024 Activities Report for Archaeological SHPO - Level 1	ASSOC STATE ARCHEO	1.2	ASST STATE ARCHEOLOGIST	1.2								
44	Cultural	Archaeology	Modify and update cultural GIS to reflect current archaeological resource conditions - Level 1	ASSOC STATE ARCHEO	1	RESRCH ANAL - GIS	1	ASST STATE ARCHEOLOGIST	1	SEAS ARCHEO PROJ LEADER	1				
45	Cultural	Historical	Site Condition Assessment - Level 1	STATE HIST II	4.5										
46	Cultural	Historical	Complete DPR 523 series forms for mapping recorded historic properties - Level 1	STATE HIST II	1.8										
47	Cultural	Historical	Conduct historical site protection based upon assessment findings - Level 1	STATE HIST II	12	PMW I	12	MAINTENANCE MECHANIC	12					\$3,675.00	
48					70.3		25.3		15.4		3.4		2.4	\$7,350.00	

### Shell Beach Area

Fee collection operational issues will be handled primarily by seasonal visitor services staff (Park Aides and Senior Park Aides), with support and supervision provided by SPPO(R)'s and SPPOS(R)'s. The reporting location of staff is Salmon Creek Ranger Station, which is a 20 minute round-trip drive from the Shell Beach area. However, it is on the same route as the Goat Rock Area, so the travel time to this location will be included in the Goat Rock Area travel time. The single proposed pay device in this area would be checked routinely by seasonal visitor services staff to collect cash, credit and visitation data, restock receipt and ticket paper and ensure device is fully functioning. Field collections will be brought to the Salmon Creek Ranger Station for processing.

Routine housekeeping maintenance will be handled by seasonal maintenance staff (Park Aide or Maintenance Aide), with support and supervision provided by PMWI's and the PMS. Restroom stalls (two total), trash cans (two total), recycling bins (one total), and the immediate grounds in these areas will be serviced by seasonal maintenance staff. Other grounds and landscaping maintenance will be conducted on a cyclical basis.

This area serves the southern portion of the Kortum Trail and the western portions of the Pomo Canyon and Red Hill Trails. Routine trail maintenance for this area will be handled by both permanent maintenance staff (PMWI, SL) and seasonal maintenance staff (SPA, MA), and supplemented through community projects and the Volunteers in Parks program.

**Shell Beach Operation Expenses**

#	PROGRAM		TASKS	PRIMARY MEANS OF IMPLEMENTATION										Materials	Equipment
	Program	Program Subcategory	Operational Task	Labor Classification(s) Needed											
				1		2		3		4		5			
				Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed		
1	Natural		Exotic Plant Control	ENVIRONMENTAL SCIENTIST	40,5	SKILLED LABORER	96	LABORER	128					\$1,120.00	\$342.72
2	Natural		Vegetation - Succession Mgmt.	ENVIRONMENTAL SCIENTIST	1.5	SKILLED LABORER	8							\$40.00	\$12.24
3	Natural		Annual Inspection	ENVIRONMENTAL SCIENTIST	12									\$10.00	\$4.70
4					13.5		104		128					\$1,170.00	\$359.66
5															
6	Facilities	Housekeeping	Vault Toilet and Use Area Housekeeping	SEAS SR MAINT AID	80	SEAS MAINT AID	109								\$480.00
7	Facilities	Housekeeping	Vault Toilet Pumping	CONTRACTED LABOR										\$1,400.00	
8	Facilities	Misc. Structures	Gate Maint. & Repair	PMW I	2	SEAS MAINT AID	2							\$150.00	\$21.15
9	Facilities	Housekeeping	Garbage Pick Up	CONTRACTED LABOR										\$586.71	
10	Facilities	Misc. Structures	Interp. Panels	PMW I	2	SEAS MAINT AID	8							\$230.00	\$18.10
11	Facilities	Buildings	Vault Restroom Maint/Repair	PMW I	4	PMA	8							\$207.04	\$30.98
12	Facilities	Buildings	Door & Lock Maintenance	PMW I	4	MAINTENANCE	4							\$207.70	\$15.25
13	Facilities	Roads	Gravel/Native Material Parking Lot	SP EQPT OPERATOR	32	SEAS MAINT AID	32							\$3,408.00	\$399.20
14	Facilities	Roads	Asphalt Road Maintenance	SP EQPT OPERATOR	2	SEAS MAINT AID	2							\$852.00	\$1,162.42
15	Facilities	Misc. Structures	Fencing Maint. & Repair	PMW I	8	SEAS MAINT AID	8	SP EQPT OPERATOR	8					\$186.60	\$17.38
16	Facilities	Trails	Annual Trail Maintenance	PMW I	20	CONTRACTED LABOR	84							\$2,125.00	\$425.55
17	Facilities	Misc. Structures	Table Maint. & Repair	PMA	8	SEAS MAINT AID	8							\$357.00	\$68.69
18					82		156		8					\$9,710.05	\$2,137.57
19															
20	Interpretation and Education	Park Interpretation	Roving Interpretation	SP INTERP I	80	SEAS PARK INTERP SPEC	105	SPPO (RANGER)	80					\$143.87	
21					80		105							\$143.87	
22															
23	Public Safety - Aquatics	Lifeguard Operations - Shift Work	Vehicle Patrol - Patrol Beaches using Seasonal and Permanent Lifeguards	SEAS LG I	3224	SEAS LG II	744	SPPO (LIFEGUARD)							
24	Public Safety - Law Enforcement	Patrol	Patrol - SPPO Lifeguard	SPPO (LIFEGUARD)	730										
25	Public Safety - Law Enforcement	Patrol	Patrol - SPPO Ranger	SPPO (RANGER)	1460										

**Shell Beach Operation Expenses**

#	PROGRAM		TASKS	PRIMARY MEANS OF IMPLEMENTATION										Materials	Equipment
	Program	Program Subcategory	Operational Task	Labor Classification(s) Needed											
				1		2		3		4		5			
				Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed		
26	Public Safety - Law Enforcement	Patrol	Patrol - SPPO Ranger	SPPO (RANGER)	88										
27	recreational svcs (Day Use and Overnight)	APM Operation (1 APMS)	APM Daily Maintenance Housingkeepng and Fee Collection	SEAS SENIOR PARK AID	404										
28	recreational svcs (Day Use and Overnight)	APM Operation (1 APMS)	Public Interaction	SEAS SENIOR PARK AID	547.5										
29					5502		744							\$-	
30															
31	Cultural	Archaeology	Present talks on current archaeological research and planning	ASSOC STATE ARCHEO	38.4										
32	Cultural	Archaeology	Conduct communications with tribal communities	ASSOC STATE ARCHEO	120										
33	Cultural	Archaeology	Conduct archaeological site inspections	ASSOC STATE ARCHEO	15	ASST STATE ARCHEOLOGIST	15								
34	Cultural	Archaeology	Complete DPR 523 Series form updates and mapping for recorded archaeological sites - Level 1	ASSOC STATE ARCHEO	9	ASST STATE ARCHEOLOGIST	9								
35	Cultural	Archaeology	Conduct archaeological site protection based upon assessment findings - Level 1	ASSOC STATE ARCHEO	5.4	PMW I	9.6	ENVIRONMENTAL SCIENTIST	9.6	SENIOR STATE ARCHEOLOGIST	9.6	Principle Mechanical and Electrical Engineer	9.6	\$14,700.00	
36	Cultural	Archaeology	Update unit data file to include current archaeological resource documentation	ASSOC STATE ARCHEO	4.8	ASST STATE ARCHEOLOGIST	4.8								
37	Cultural	Archaeology	Prepare Annual PRC 5024 Activities Report for Archaeological SHPO - Level 1	ASSOC STATE ARCHEO	4.8	ASST STATE ARCHEOLOGIST	4.8								
38	Cultural	Archaeology	Modify and update cultural GIS to reflect current archaeological resource conditions - Level 1	ASSOC STATE ARCHEO	3.6	RESRCH ANAL - GIS	3.6	ASST STATE ARCHEOLOGIST	3.6	SEAS ARCHEO PROJ LEADER	3.6				

**Shell Beach Operation Expenses**

#	PROGRAM		TASKS	PRIMARY MEANS OF IMPLEMENTATION										Materials	Equipment
	Program	Program Subcategory	Operational Task	Labor Classification(s) Needed											
				1		2		3		4		5			
				Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed		
39	Cultural	Historical	Site Condition Assessment - Level 1	STATE HIST II	18										
40	Cultural	Historical	Complete DPR 523 series forms for mapping recorded historic properties - Level 1	STATE HIST II	7.2										
41	Cultural	Historical	Conduct historical site protection based upon assessment findings - Level 1	STATE HIST II	7.2	PMW I	7.2	MAINTENANCE MECHANIC	7.2					\$14,700.00	
42					233.4		54		20.4		13.2		9.6	\$29,400.00	

### Stump Beach Area

Fee collection and pay station operational issues will be handled by seasonal visitor services staff (Park Aide, Senior Park Aides) with support and supervision provided by SPPOS(R)'s. Reporting location of staff is the Salt Point Ranger Station, which is a 10 minute round-trip drive from the Stump Beach area, however, it is on the same route as an existing fee area at Fisk Mill Cove, so the travel time to this area is already included in the existing operations costs of the District. The single proposed pay device in this area would be checked routinely by visitor services staff to collect cash and credit data, ensure receipt paper supplies and full functioning of devices. Field collections would be returned and brought to the Salt Point Ranger Station for processing by seasonal visitor services staff.

Routine housekeeping, grounds and facility maintenance will be handled by seasonal maintenance staff (Park Aide or Maintenance Aide), with support and supervision provided by PMWI and the PMS. The 1 restroom stall, 1 trash can, and the immediate facility grounds in these areas will be serviced by seasonal maintenance staff. Mowing and periodic grounds maintenance in these areas typically occurs cyclically. Reporting location of staff is Salt Point Maintenance Shop, which is a 10 minute round-trip drive from the Stump Beach Area.

The routine maintenance of the Stump Beach Trail, access trail to the beach, and the portions of the Coastal Trail served at this location will be handled by both permanent maintenance staff (PMWI, SL) and seasonal maintenance staff (SPA, MA), and supplemented through community projects and the Volunteers in Parks program.

**Stump Beach Operation Expenses**

PROGRAM		TASKS	PRIMARY MEANS OF IMPLEMENTATION										Materials	Equipment
Program	Program Subcategory	Operational Task	Labor Classification(s) Needed											
			1	2	3	4	5							
			Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed		
Facilities	Housekeeping	Vault Toilet and Use Area Housekeeping	SEAS SR MAINT AID	80	SEAS MAINT AID	109							\$500.00	\$250.00
Facilities	Housekeeping	Vault Toilet Pumping	CONTRACTED LABOR										\$840.00	
Facilities	Misc. Structures	Gate Maint. & Repair	PMW I	2	SEAS MAINT AID	2							\$150.00	\$21.15
Facilities	Buildings	Vault Restroom Maint/Repair	PMW I	4	PMA	8							\$103.52	\$46.50
Facilities	Buildings	Door & Lock Maintenance	PMW I	4	MAINTENANCE MECHANIC								\$103.85	\$15.25
Facilities	Buildings	Carpentry Repair	PMW I	12	SEAS MAINT AID	4							\$150.00	\$90.70
Facilities	Roads	Gravel/Native Material Parking Lot	SP EQPT OPERATOR	32	SEAS MAINT AID	32							\$2,938.00	\$625.00
Facilities	Roads	Asphalt Road Maintenance	SP EQPT OPERATOR	2	SEAS MAINT AID	2							\$3,408.00	\$49.90
Facilities	Misc. Structures	Fencing Maint. & Repair	PMW I	8	SEAS MAINT AID	8	SP EQPT OPERATOR	8					\$186.60	\$17.38
Facilities	Trails	Annual Trail Maintenance	PMW I	8	CONTRACTED LABOR	11							\$851.53	\$425.55
Facilities	Misc. Structures	Table Maint. & Repair	PMA	8	SEAS MAINT AID	8							\$357.00	\$68.69
				<b>80</b>		<b>75</b>		<b>8</b>					<b>\$8,248.50</b>	<b>\$1,360.12</b>
Interpretation and Education	Park Interpretation	Roving Interpretation	SP INTERP I	80	SEAS PARK INTERP SPEC	105							\$143.87	
				<b>80</b>		<b>105</b>							<b>\$143.87</b>	<b>\$2,637.34</b>
Public Safety - Aquatics	Lifeguard Operations - Shift Work	Vehicle Patrol - Patrol Beaches using Seasonal and Permanent Lifeguards	SEAS LG I	3224	SEAS LG II	744	SPPO (LIFEGUARD)							
Public Safety - Law Enforcement	Patrol	Patrol - SPPO Lifeguard	SPPO (LIFEGUARD)	730										
Public Safety - Law Enforcement	Patrol	Patrol - SPPO Ranger	SPPO (RANGER)	1460										
Public Safety - Law Enforcement	Patrol	Patrol - SPPO Ranger	SPPO (RANGER)	88										
Recreational Svcs (Day Use and Overnight)	APM Operation (1 APMS)	APM Daily Maintenance Housingkeeping and Fee Collection	SEAS SENIOR PARK AID	404										
Recreational Svcs (Day Use and Overnight)	APM Operation (1 APMS)	Public Interaction	SEAS SENIOR PARK AID	547.5										
				<b>5758</b>		<b>1048</b>		<b>8</b>		<b>0</b>		<b>0</b>	<b>\$-</b>	

### All Proposed Fee Areas

While serving the field collection and routine maintenance and housekeeping functions, seasonal visitor services and maintenance staff would also provide park information to visitors upon request and update other park staff on field conditions, maintenance needs, and visitation activity.

Aquatic safety and emergency response services will continue to be provided by existing Seasonal Lifeguard and SPPO(L) staff. As noted above, there may be an increase in patrol time and calls for service associated with specific areas being re-opened as a result of the proposed fee areas.

Law enforcement and emergency response will continue to be provided by existing SPPO and SPPOS(R) staff. Increased need for theft and vandalism prevention patrol and response, as well as increased payment enforcement is anticipated as a result of proposed pay devices. An increase in administrative time for review of park citations and requests for refunds and change is expected.

SPPO(R)'s and SPPOS(R)'s approve the accounting documents and transport the bank deposits to the bank located in Guerneville (a 1 hour round-trip drive from the Salmon Creek Ranger Station and a 2 hour round-trip drive from Salt Point State Park). Although accounting time will increase as a result of the proposed pay devices, the bank transport costs are not anticipated to increase, as the frequency of bank transports will remain consistent with existing operations.

Annual road and parking surface maintenance all areas will be handled primarily by permanent maintenance staff (HEO, PMWI, PMS, SL) with assistance from seasonal maintenance staff, or via State contract.

Contract management and payment for services associated with automated pay devices, credit card processing, septic pumping, and garbage collection for all areas will be handled via the District administrative staff, primarily a Staff Services Analyst and Management Services Technician.

The current Volunteer In Parks program serving the proposed fee areas will continue to be co-managed by the District and Stewards of the Coast and Redwoods. Volunteers are utilized for a variety of program areas including interpretation and education, stewardship projects, citizen science and trail maintenance to enhance visitor experiences and supplement park programs.

In addition to periodic and ongoing restoration and preservation projects, monthly monitoring for impacts to natural and cultural resources, will be carried out by qualified park staff (ES, SES, SA).

Development plans, non-routine maintenance projects, and new visitor service programs (such as roving interpretation) will be conceptualized, budgeted, and permitted by the District core staff, as funds are available. These costs are difficult to

predict and are dependent upon funding and staffing capacities at the time funding becomes available. By charging fee at these sites, it increases the potential opportunities for future funding.

### **Key Recommendations**

The plan is intended to enable the Department to improve the identification, justification, and prioritization of maintenance requirements for park and recreation areas. This is achieved by establishing a clear quantification of resources necessary to maintain the current system, accounting for aging facilities that continually deteriorate from use, increased visitation, and shrinking budgets. Specifically, the key recommendations were developed from the context that park areas and facilities are currently under-maintained, with insufficient labor and budget resources inhibiting the staff to maintain current standards with deteriorating facilities and increased visitation.

#### Address Design Issues

There are a number of facilities featuring design issues that increase the associated maintenance requirements. Specific examples of this include parking areas, roadways, and trails subject to coastal erosion, and maintaining ADA compliance of accessible trails. The design issues identified do not appear to be the fault of any party, but rather the result of evolved circumstances and natural processes along the coast. It is critical to properly scope these issues and work to address them over a phased time period in order to improve the overall quality of sites and facilities, as well as improve the efficiency of regular maintenance requirements.

#### Standardize Regular Maintenance Requirements

Over the years, the regular maintenance requirements have become fairly normalized and can be quantified by labor hours necessary to perform task in order to estimate additional maintenance requirements. While not all standardized projections for regular maintenance requirements of sites and facilities are provided, examples of the types of functions recommended to standardize include:

- Established standards for maintenance of different types of sites and facilities
- Labor requirements per site including seasonal fluctuations
- Material and supply requirements
- Equipment requirements
- Utilities and miscellaneous expenses

#### Utilize Best Management Practices

Best management practices for park and recreation agencies integrate sustainability approaches within maintenance management efforts. Several of these are related directly or indirectly to maintenance responsibilities. This includes energy conservation, use of hybrid or electric vehicles, use of solar power, reducing staff driving time, and recycling. The recommended best practices described below can be integrated into the proposed fee collection area's management priorities for purposes of preserving the resources and ensuring the quality and integrity of facilities.

- Best managed park and recreation systems have a maintenance budgeting system (Maximo) in place to track the cost of maintenance, utilities, supplies, equipment and

employee time for parks and recreation facilities based on set standards. Maximo also manages facilities lifecycles for all replacement schedules to keep parks and facilities up to the level they need to so the public will enjoy them for a long period of time.

- Best practice agencies have an equipment replacement program established and funded to keep equipment tied to employee productivity and supporting the efficiency goals of the agency.
- Best management agencies have maintenance management plans in place to keep control of maintenance costs and efficiency.
- Best practice agencies have established design standards for parks and recreation facilities based on sustainable practices and desired outcome.
- Best practice agencies have maintenance and program standards that support design standards to operate as efficiently as possible while supporting the customer service requirements of the program or facility.

### Address Deferred Maintenance

There are a number of sites and facilities within the proposed fee collection areas that are in need of upgrade or rehabilitation to decrease associated maintenance requirements, improve the protection of the resources and improve the visitor's experience. Visitor expectations of park / facility conditions will be higher for fee areas. Addressing design issues like these are generally costly, and in some cases require additional planning efforts.

Not all design issues are addressed within this aspect of the plan. Only those that directly or indirectly increase the maintenance requirements or decrease the efficiency of the maintenance team in performing necessary tasks are detailed. Future improvements are planned and can be viewed in detail in Appendix F.

### **Projecting Future Requirements**

A common dilemma of Park and Recreation agencies around the United States is the inability to adequately resource the requirements to maintain the quality and integrity of sites and facilities. This is particularly true of highly visited recreation areas. Park and Recreation budgets are rarely sufficient to strictly adhere to industry best practices for asset protection and regular facility maintenance. This creates the need for prioritizing resources and maintenance projects. This usually results in growing inventories of deferred maintenance that become increasingly difficult to fully address over time. For a detailed list of future improvement, see Appendix F.

### **Summary of Recommendations**

These parameters can serve the Department to sufficiently plan for the budget and resources necessary to maintain the current quality of sites and facilities. It is critical that assets be sufficiently maintained throughout their lifecycle to avoid problematic issues including, but not limited to asset failure, premature capital replacement, and the build-up of significant deferred maintenance.

Among the most challenging budget woes of park and recreation agencies around the United States is having the support to adequately plan for major capital repair and

replacement costs. Major capital repair and replacement planning is an inherited responsibility that comes with all equipment, vehicles, utilities and infrastructure, structures, facilities, major amenities, trails, and open spaces within the System. Generally major capital repair and replacement needs are distributed over a longer period of time, but they are costly and sometimes require unique planning efforts. It is hoped that the proposed additional fee collection areas will help to address this funding need.

It is recommended that the Department retain an updated maintenance management plan every five years that would monitor and support the optimal productivity of the maintenance efforts. The recommended efficiency standards are intended to inspire the next generation of maintenance management plan for the Department to continue the standardization and efficient usage of site and facility maintenance resources.





Service-Based Budgeting - Service Task List

#	Mission Focus	PROGRAM			TASKS			STANDARDS		PRIMARY MEANS OF IMPLEMENTATION												JUSTIFICATION										
		Program	Program Sub-Category (as needed)	Program Sub-Sub-Category (as needed)	Task Category	Operational Task	Task Description	Same Task, Different Standard	Deliverable Standards for Operational Task	Task Driver(s)	Task Multiplier	Task Type	Labor Classification(s) Needed						Materials	Equipment	Justification Categories for Standards											
													1	2	3	4	5	6			Legal Mandate	Statewide or Dept Policies	Professional and/or Industry Standards	Operational Necessity	Park Ops Standards 2009	Transform. Team Initiatives						
								Desired Performance	Frequency		See tab task type for more information	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed											
1	Steward Resources	Natural			Exotic Plant Species	Exotic Plant Control		Non-Native Plant Species Removed	Annually		Acree, Number of Exotic Species	ENVIRONMENTAL SCIENTIST	89	SKILLED LABORER	220	LABORER	300							\$2,600.00	\$795.60		X	X				DOM 0310.1.1, DOM 0310.7, DOM 0310.7.2
2	Steward Resources	Natural			Vegetation Management	Vegetation - Succession Mgmt.		Maintain Native Plant Species	Annually		Acree of Native Plant Species to Maintain	ENVIRONMENTAL SCIENTIST	4.5	SKILLED LABORER	22								\$120.00	\$58.14		X	X				DOM 0310.1.1, DOM 0310.7, DOM 0310.7.2	
3	Steward Resources	Natural			Inspection	Management Unit Annual Inspection		Monitor Native and Non-Native Species to Develop Annual Work Plan	Annually		Acree	ENVIRONMENTAL SCIENTIST	12										\$10.00	\$4.70		X	X				DOM 0310.1.1, DOM 0310.7, DOM 0310.7.2	
4	Steward Resources	Natural			Animal Control	Hunt Non-Native Animal		Remove Non-Native Animals	Annually		Acree, Number of Non-Native Animal Species	ENVIRONMENTAL SCIENTIST	2	SKILLED LABORER	12								\$10.00	\$5.88		X	X				DOM 0310.1.1, DOM 0310.7, DOM 0310.7.2	
													107.5		254		300						\$2,740.00	\$864.32								
5	Serve the Public	Facilities	Buildings	Preventative Maintenance	Routine Maintenance	Plumbing Maintenance & Repair (includes Fixtures) Does not include Distribution System		Provide functional restroom for sanitary needs	Annual		Age & Condition	MAINTENANCE MECHANIC	16	PMW I	16								\$659.03			X					DOM 1600	
6	Serve the Public	Facilities	Buildings	Preventative Maintenance	Structural Maintenance	Painting - Interior/Exterior		Reduce long-term maintenance costs and help ensure facility is in use for its intended purpose for an optimum length of time	2 to 5 Years		Age & Condition	PMA	24	SEAS MAINT AID	24								\$155.00	\$110.00		X						
7	Serve the Public	Facilities	Buildings	Preventative Maintenance	Structural Maintenance	Painting - Touch Up		Reduce long-term maintenance costs and help ensure facility is in use for its intended purpose for an optimum length of time	Annual		Age & Condition	PMA	4	SEAS MAINT AID	4								\$40.00	\$30.98		X						
8	Serve the Public	Facilities	Buildings	Preventative Maintenance	Structural Maintenance	Window Maintenance & Repair		Reduce long-term maintenance costs and help ensure facility is in use for its intended purpose for an optimum length of time	Annual		Age & Condition	PMW I	16										\$150.00	\$30.98		X					DOM Chapter 16	
12	Serve the Public	Facilities	Buildings	Preventative Maintenance	Routine Maintenance	Door & Lock Maintenance		Reduce long-term maintenance costs and help ensure facility is in use for its intended purpose for an optimum length of time	Annual		Age & Condition	MAINTENANCE MECHANIC	16	PMW I	16								\$1,415.93	\$15.25		X						
17	Serve the Public	Facilities	Buildings, Misc. Structures	Preventative Maintenance	Routine Maintenance	Vandalism		Reduce long-term maintenance costs and help ensure facility is in use for its intended purpose for an optimum length of time	Daily to Annual depending upon park unit		# of Occurrences	MAINTENANCE MECHANIC	24	PMW I	24	SEAS MAINT AID	24						\$500.00	\$85.20		X						
20	Serve the Public	Facilities	Grounds	Preventative Maintenance	Public Safety	Mowing		Provide fire breaks, line of sight and may provide for safe recreational opportunities for park visitors	Weekly during growing season			PMA	40	SEAS MAINT AID	40									\$285.00			X					
21	Serve the Public	Facilities	Grounds	Preventative Maintenance	Public Safety	Weeding		Provide for visually pleasing and safe recreational opportunities for park visitors, reduces pest, foundation impacts and fire hazard to buildings	Weekly during growing season			PMA	40	SEAS MAINT AID	40									\$42.00			X					
23	Serve the Public	Facilities	Housekeeping	On-Going Operations	Housekeeping	Garbage Pick Up		Keep parks clean, reducing vectors and predators protecting the Natural resource while providing a pleasant visitor experience.	Daily to monthly depending upon season			CONTRACTED LABOR											\$1,173.41			X					Old DOM Chapter 1000 (Housekeeping)	
25	Serve the Public	Facilities	Buildings	On-Going Operations	Housekeeping	Vault Toilet Pumping		Provide clean and sanitary facilities for the health and safety of the visiting public.	Minimum Twice Yearly		Level of Public Use & Basic Sanitation	CONTRACTED LABOR											\$4,550.00			X					Old DOM Chapter 1000 (Housekeeping)	
26	Serve the Public	Facilities	Misc. Structures	Preventative Maintenance	Routine Maintenance	Gate Maint. & Repair		Have gate function as designed to provide secure access to areas for park visitors and staff	Annual			PMW I	8	SEAS MAINT AID	8								\$250.00			X						
28	Serve the Public	Facilities	Housekeeping	On-Going Operations	Housekeeping	Vault Toilet and Use Area Housekeeping, Pogy (Litter Pickup)		Provide clean and sanitary facilities for the health and safety of the visiting public.	Daily			PMA	100	SEAS MAINT AID	400	SEAS SR MAINT AID	400						\$500.00	\$125.00		X						
29	Serve the Public	Facilities	Trails	Preventative Maintenance	Routine Maintenance	Annual Trail Maintenance		Maintain various structures and other conveniences to deliver services to park visitors	Annual		Condition	PMW I	90	CONTRACTED LABOR	428.79								\$10,857.84	\$2,668.00		X					DOM 1600, Trail Handbook	
30	Serve the Public	Facilities	Misc. Structures	Preventative Maintenance	Routine Maintenance	Day Use Furniture		Maintain various structures and other conveniences to deliver services to park visitors	Annual		Age & Condition	PMW I	8										\$558.13	\$68.69		X					DOM Chapter 16	
31	Serve the Public	Facilities	Roads	Preventative Maintenance	Routine Maintenance	Asphalt Road and Parking Maintenance		Preservation of right of way, appurtenances and signs. Maintains access to park locations	Annual, 2 to 5 year cycle		Condition	SP EQPT OPERATOR	30	PMW I	16	PMA	30						\$48,336.00	\$3,724.74		X					DOM Chapter 16	
32	Serve the Public	Facilities	Roads	Preventative Maintenance	Routine Maintenance	Gravel/Native Material Parking Lot Maintenance		Provide a delineated parking area for public access	Annual, 2 to 5 year cycle		Condition	SP EQPT OPERATOR	80	SEAS MAINT AID	80								\$13,863.00	\$7,695.00		X					DOM 1600	
33	Serve the Public	Facilities	Roads	Preventative Maintenance	Routine Maintenance	Barricade Maintenance		Provide a delineated parking area for public access	Annual, 2 to 5 year cycle		Condition	SP EQPT OPERATOR	10	SEAS MAINT AID	10								\$1,462.60	\$450.00		X					DOM 1600	
34													613.5		1360.79		754						\$87,210.94	\$16,195.16								
35																																
37	Serve the Public	Interpretation and Education	Park Interpretation	In-park Public Interpretation	In-park Public programs	Roving Interpretation		Make interpretive contacts available for visitors who would like to participate fun, educational opportunities	Annual		Park Attendance	SP INTERP I	80	SEAS PARK INTERP SPEC	105	SPPO (RANGER)	80						\$143.87			X					DOM 0904.6.14, 2009 Park Operations Standards pg. 75	
38													80		105		80						\$143.87									
39																																



Service-Based Budgeting - Service Task List

#	Mission Focus	PROGRAM			TASKS			STANDARDS		PRIMARY MEANS OF IMPLEMENTATION												JUSTIFICATION																	
		Program	Program Subcategory (as needed)	Program Sub-Sub Category (as needed)	Task Category	Operational Task	Task Description	Same Task, Different Standard	Deliverable Standards for Operational Task	Task Driver(s)	Task Multiplier	Task Type	Labor Classification(s) Needed												Materials	Equipment	Justification Categories for Standards						Justification Notes						
													1	2	3	4	5	6	7	8	9	10	11	12			13	14	15	16	17	18		19	20	21	22	23	24
								Desired Performance	Frequency			See tab task type for more information	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed			Legal Mandate	Statewide or Dept Policies	Professional and/or Industry Standards	Operational Necessity	Park Ops Standards 2009	Transform. Team Initiatives							
1	Steward Resources	Natural			Exotic Plant Species	Exotic Plant Control		Non-Native Plant Species Removed	Annually			Type II - Park Informed	ENVIRONMENTAL SCIENTIST	40.5	SKILLED LABORER	96	LABORER	128							\$1,120.00	\$342.72		X	X					DOM 0310.1.1, DOM 0310.7, DOM 0310.7.2					
2	Steward Resources	Natural			Vegetation Management	Vegetation - Succession Mgmt.		Maintain Native Plant Species	Annually			Type II - Park Informed	ENVIRONMENTAL SCIENTIST	1.5	SKILLED LABORER	8									\$40.00	\$12.24		X	X					DOM 0310.1.1, DOM 0310.7, DOM 0310.7.2					
3	Steward Resources	Natural			Inspection	Annual Inspection		Monitor Native and Non-Native Species to Develop Annual Work Plan	Annually			Type II - Park Informed	ENVIRONMENTAL SCIENTIST	12										\$10.00	\$4.70		X	X					DOM 0310.1.1, DOM 0310.7, DOM 0310.7.2						
4														13.5		104		128							\$1,170.00	\$359.66													
6	Serve the Public	Facilities	Housekeeping	On-Going Operations	Housekeeping	Vault Toilet and Use Area Housekeeping		Provide clean and sanitary facilities for the health and safety of the visiting public.	Daily			Type II - Park Informed	SEAS SR MAINT AID	80	SEAS MAINT AID	109									\$480.00			X						Old DOM Chapter 1000 (Housekeeping)					
7	Serve the Public	Facilities	Housekeeping	On-Going Operations	Housekeeping	Vault Toilet Pumping		Provide clean and sanitary facilities for the health and safety of the visiting public.	Minimum Twice Yearly			Type II - Park Informed	CONTRACTED LABOR											\$1,400.00			X							Old DOM Chapter 1000 (Housekeeping)					
8	Serve the Public	Facilities	Misc. Structures	Preventative Maintenance	Routine Maintenance	Gate Maint. & Repair		Have gate function as designed to provide secure access to areas for park visitors and staff	Annual			Type II - Park Informed	PMW I	2	SEAS MAINT AID	2									\$150.00	\$21.15		X						DOM 1600					
9	Serve the Public	Facilities	Housekeeping	On-Going Operations	Housekeeping	Garbage Pick Up		Keep parks clean, reducing vectors and predators protecting the natural resource while providing a pleasant visitor experience.	Daily to monthly depending upon season			Type II - Park Informed	CONTRACTED LABOR												\$586.71			X						Old DOM Chapter 1000 (Housekeeping)					
10	Serve the Public	Facilities	Misc. Structures	Preventative Maintenance	Routine Maintenance	Interp. Panels		Provide aesthetically pleasing panels to provide interpretive information for the public.	Annual			Type II - Park Informed	PMW I	2	SEAS MAINT AID	8									\$230.00	\$18.10		X						DOM 1600					
12	Serve the Public	Facilities	Buildings	Preventative Maintenance	Routine Maintenance	Vault Restroom Maint/Repair		Provide functional restroom for sanitary needs	Annual			Type II - Park Informed	PMW I	4	PMA	8									\$207.04	\$30.98		X						DOM 1600					
13	Serve the Public	Facilities	Buildings	Preventative Maintenance	Routine Maintenance	Door & Lock Maintenance		Reduce long-term maintenance costs and help ensure facility is in use for its intended purpose for an optimum length of time	Annual			Type II - Park Informed	PMW I	4	MAINTENANCE MECHANIC	4									\$207.70	\$15.25		X						DOM 1600					
14	Serve the Public	Facilities	Roads	Preventative Maintenance	Routine Maintenance	Gravel/Native Material Parking Lot Maintenance		Provide a delineated parking area for public access	Annual, 2 to 5 year cycle			Type II - Park Informed	SP EQPT OPERATOR	32	SEAS MAINT AID	32									\$3,408.00	\$399.20		X						DOM 1600					
15	Serve the Public	Facilities	Roads	Preventative Maintenance	Routine Maintenance	Asphalt Road Maintenance		Preservation of right of way, appurtenments and signs. Maintains access to park locations	Annual, 2 to 5 year cycle			Type II - Park Informed	SP EQPT OPERATOR	2	SEAS MAINT AID	2									\$852.00	\$1,162.42		X						DOM 1600					
16	Serve the Public	Facilities	Misc. Structures	Preventative Maintenance	Routine Maintenance	Fencing Maint. & Repair		Define boundaries and provide site protection	Annual			Type II - Park Informed	PMW I	8	SEAS MAINT AID	8	SP EQPT OPERATOR	8							\$186.60	\$17.38		X						DOM 1601					
17	Serve the Public	Facilities	Trails	Preventative Maintenance	Routine Maintenance	Annual Trail Maintenance		Maintain various structures and other conveniences to deliver services to park visitors	Annual			Type II - Park Informed	PMW I	20	CONTRACTED LABOR	84									\$2,125.00	\$425.55		X						DOM 1600, Trail Handbook					
18	Serve the Public	Facilities	Misc. Structures	Preventative Maintenance	Routine Maintenance	Table Maint. & Repair		Maintain various structures and other conveniences to deliver services to park visitors	Annual			Type II - Park Informed	PMA	8	SEAS MAINT AID	8									\$357.00	\$68.69		X						DOM 1601					
19														82		156		8							\$9,710.05	\$2,137.57													
21	Serve the Public	Interpretation and Education	Park Interpretation	In-park Public Interpretation	In-park Public programs	Roving Interpretation		Make interpretive contacts available for visitors who would like to participate fun, educational opportunities	Annual			Type II - Park Informed	SP INTERP I	80	SEAS PARK INTERP SPEC	105	SPO (RANGER)	80							\$143.87			X						DOM 0904.6.14, 2009 Park Operations Standards pg. 75					
22														80		105									\$143.87														
24	Serve the Public	Public Safety - Aquatics	Lifeguard Operations - Shift Work	Vehicles	Lifeguard Operations	Vehicle Patrol - Patrol Boats using Seasonal and Permanent Lifeguards		Maintain proactive presence/patrol for shift duration	Daily		Annual History of visitation/injuries/events, size of park/beach, visibility and weather	Type II - Park Informed	SEAS LG I	3224	SEAS LG II	744	SPO (LIFEGUARD)																		USLA and Aquatics Handbook				
25	Serve the Public	Public Safety - Law Enforcement	Patrol	Vehicle patrol - Lifeguard	Patrol	Patrol - SPO Lifeguard		Maintain proactive presence/patrol for shift duration	Daily			Type II - Park Informed	SPO (LIFEGUARD)	730																				USLA and Aquatics Handbook					
26	Serve the Public	Public Safety - Law Enforcement	Patrol	Vehicle patrol - Ranger	Patrol	Patrol - SPO Ranger		Maintain proactive presence/patrol for shift duration	Daily			Type II - Park Informed	SPO (RANGER)	1460																									
27	Serve the Public	Public Safety - Law Enforcement	Patrol	Cultural Resource Protection	Patrol	Patrol - SPO Ranger		Maintain proactive presence/patrol for shift duration	Daily		Per Park	Type II - Park Informed	SPO (RANGER)	88																									
28														5502		744		80		0		0			\$-														
47	Steward Resources	Cultural	Archaeology		Public Outreach	Present talks on current archaeological research and planning		Public is well-informed			Outreach distribution and volume	Type II - Park Informed	ASSOC STATE ARCHEO	38.4																					Transformation Team-Foster Partnerships; "Mission Based Outreach"				



Service-Based Budgeting - Service Task List

#	Mission Focus	PROGRAM			TASKS			STANDARDS		PRIMARY MEANS OF IMPLEMENTATION												JUSTIFICATION											
		Program	Program Subcategory (as needed)	Program Sub-Sub Category (as needed)	Task Category	Operational Task	Task Description	Same Task, Different Standard	Deliverable Standards for Operational Task	Task Driver(s)	Task Multiplier	Task Type	Labor Classification(s) Needed						Materials	Equipment	Justification Categories for Standards					Justification Notes							
									Desired Performance	Frequency		See tab task type for more information	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed	Labor Class Needed	Hours needed			Legal Mandate	Statewide or Dept Policies	Professional and/or Industry Standards	Operational Necessity	Park Ops Standards 2009	Transform. Team Initiatives	
1	Serve the Public	Facilities	Housekeeping	On-Going Operations	Housekeeping	Vault Toilet and Use Area Housekeeping	Clean toilet, walls, floors, stock toilet paper, potty	Provide clean and sanitary facilities for the health and safety of the visiting public.	Daily		Level of Public Use & Basic Sanitation	Type II - Park Informed	SEAS SR MAINT AID	80	SEAS MAINT AID	109									\$500.00	\$250.00		X					Old DOM Chapter 1000 (Housekeeping)
1	Serve the Public	Facilities	Housekeeping	On-Going Operations	Housekeeping	Vault Toilet Pumping	Empty vault on a regular schedule to provide for a clean, sanitary facility	Provide clean and sanitary facilities for the health and safety of the visiting public.	Minimum Twice Yearly		Level of Public Use & Basic Sanitation	Type II - Park Informed	CONTRACTED LABOR											\$840.00			X					Old DOM Chapter 1000 (Housekeeping)	
1	Serve the Public	Facilities	Misc. Structures	Preventative Maintenance	Routine Maintenance	Gate Maint. & Repair	Inspect annually, schedule preventive maintenance repairs based on condition. Replace as needed.	Have gate function as designed to provide secure access to areas for park visitors and staff	Annual		Age & Condition	Type II - Park Informed	PMW I	2	SEAS MAINT AID	2								\$150.00	\$21.15		X					DOM 1600	
1	Serve the Public	Facilities	Buildings	Preventative Maintenance	Routine Maintenance	Vault Restroom Maint/Repair	Inspect annually, schedule preventive maintenance repairs based on facility condition. Emergency repairs scheduled on an as needed basis.	Provide functional restroom for sanitary needs	Annual		Age & Condition	Type II - Park Informed	PMW I	4	PMA	8								\$103.52	\$46.50		X					DOM 1600	
2	Serve the Public	Facilities	Buildings	Preventative Maintenance	Routine Maintenance	Door & Lock Maintenance	Inspect annually, schedule preventive maintenance repairs based on facility condition. Emergency repairs scheduled on an as needed basis.	Reduce long-term maintenance costs and help ensure facility is in use for its intended purpose for an optimum length of time	Annual		Age & Condition	Type II - Park Informed	PMW I	4	MAINTENANCE MECHANIC									\$103.85	\$15.25		X					DOM 1600	
2	Serve the Public	Facilities	Buildings	Preventative Maintenance	Routine Maintenance	Carpentry Repair	Inspect annually, schedule preventive maintenance repairs based on facility condition. Emergency repairs scheduled on an as needed basis.	Reduce long-term maintenance costs and help ensure facility is in use for its intended purpose for an optimum length of time	Annual		Age & Condition	Type II - Park Informed	PMW I	12	SEAS MAINT AID	4								\$150.00	\$90.70		X					DOM 1600	
4	Serve the Public	Facilities	Roads	Preventative Maintenance	Routine Maintenance	Gravel/Native Material Parking Lot Maintenance	Inspect annually, schedule preventive maintenance repairs based on facility condition. Emergency repairs scheduled on an as needed basis.	Provide a delineated parking area for public access	Annual, 2 to 5 year cycle		Condition	Type II - Park Informed	SP EQPT OPERATOR	32	SEAS MAINT AID	32								\$2,938.00	\$625.00		X					DOM 1600	
4	Serve the Public	Facilities	Roads	Preventative Maintenance	Routine Maintenance	Asphalt Road Maintenance	Inspect annually, schedule preventive maintenance repairs based on facility condition. Emergency repairs scheduled on an as needed basis.	Preservation of right of way, appurtenants and signs. Maintains access to park locations	Annual, 2 to 5 year cycle		Condition	Type II - Park Informed	SP EQPT OPERATOR	2	SEAS MAINT AID	2								\$3,408.00	\$49.90		X					DOM 1600	
5	Serve the Public	Facilities	Misc. Structures	Preventative Maintenance	Routine Maintenance	Fencing Maint. & Repair	Replace wood fencing that is damaged or missing	Define boundaries and provide site protection	Annual		Condition	Type II - Park Informed	PMW I	8	SEAS MAINT AID	8	SP EQPT OPERATOR	8						\$186.60	\$17.38		X					DOM 1600	
6	Serve the Public	Facilities	Trails	Preventative Maintenance	Routine Maintenance	Annual Trail Maintenance	Provide a clear and maintained trail with proper drainage, even tread surface while reducing resource impacts in accordance to Department Trail Standards.	Maintain various structures and other conveniences to deliver services to park visitors	Annual		Condition	Type II - Park Informed	PMW I	8	CONTRACTED LABOR	11								\$851.53	\$425.55		X					DOM 1600, Trail Handbook	
7	Serve the Public	Facilities	Misc. Structures	Preventative Maintenance	Routine Maintenance	Table Maint. & Repair	Inspect annually, schedule preventive maintenance repairs based on facility condition. Emergency repairs scheduled on an as needed basis.	Maintain various structures and other conveniences to deliver services to park visitors	Annual		Condition	Type II - Park Informed	PMA	8	SEAS MAINT AID	8								\$357.00	\$68.69		X					DOM 1600	
8													80		75								\$8,248.50	\$1,360.12									
10	Serve the Public	Interpretation and Education	Park Interpretation	In-park Public Interpretation	In-park Public programs	Roving Interpretation	Brief interpretive contacts; either interpreter roving and talking to visitors. Includes both indoor and outdoor contacts, including prep time and clean up.	Make interpretive contacts available for visitors who would like to participate fun, educational opportunities	Annual		Park Attendance	Type II - Park Informed	SP INTERP I	80	SEAS PARK INTERP SPEC	105								\$143.87			X					DOM 0904.6.14, 2009 Park Operations Standards pg. 75	
11													80		105								\$143.87	\$2,637.34									
13	Serve the Public	Public Safety - Aquatics	Lifeguard Operations - Shift Work	Vehicles	Lifeguard Operations	Vehicle Patrol - Patrol Beaches using Seasonal and Permanent Lifeguards	Effect rescues, support other rescuers, and coordinate efforts.	Maintain proactive presence/patrol for shift duration	Daily	Annual history of visitation/injuries/events, size of park/beach, visibility and weather	Number of Shifts	Type II - Park Informed	SEAS LG I	3224	SEAS LG II	744	SPO (LIFEGUARD)																USLA and Aquatics Handbook
14	Serve the Public	Public Safety - Law Enforcement	Patrol	Vehicle patrol - Lifeguard	Patrol	Patrol - SPO Lifeguard	Includes Vehicle, Foot, etc.	Maintain proactive presence/patrol for shift duration	Daily	Park Attendance	Number of Shifts	Type II - Park Informed	SPO (LIFEGUARD)	730																		USLA and Aquatics Handbook	
15	Serve the Public	Public Safety - Law Enforcement	Patrol	Vehicle patrol - Ranger	Patrol	Patrol - SPO Ranger	Includes Vehicle, Foot, etc.	Maintain proactive presence/patrol for shift duration	Daily	Park Attendance	Number of Shifts	Type II - Park Informed	SPO (RANGER)	1460																			
16	Serve the Public	Public Safety - Law Enforcement	Patrol	Cultural Resource Protection	Patrol	Patrol - SPO Ranger	Check Cultural Sites for vandalism	Maintain proactive presence/patrol for shift duration	Daily	Per Park	Number of Shifts	Type II - Park Informed	SPO (RANGER)	88																			
17													5758		1048		8		0		0			\$-									

APPENDIX H

**LETTER FROM DR. CHARLES LESTER TO DIRECTOR  
GENERAL JACKSON**

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## CALIFORNIA COASTAL COMMISSION

45 FREMONT STREET, SUITE 2000  
SAN FRANCISCO, CA 94105-2219  
VOICE (415) 904-5200  
FAX (415) 904-5400  
TDD (415) 597-5885



May 20, 2013

Dear Major General Jackson,

I write to express my appreciation for our recent communications, and to memorialize our discussions of our mutual understanding of the responsibilities of California State Parks (CSP) and the California Coastal Commission to protect and provide public access and recreation along California's coast. This shared mission is vital to the citizens of California and to its multi-billion dollar coastal economy. Our agencies must do their best, therefore, to work together to address the challenges that we face and to find shared solutions.

As you and I discussed in our initial meeting, and again on March 11, Commission staff (CCC) is committed to working with CSP through the relevant permitting processes to identify mutually-agreeable outcomes, including identifying those cases where the CCC would not need to exercise its jurisdiction or where permit streamlining can be achieved. To this end, I offer the following points which I believe capture the spirit and intent of our conversations that have taken place between our headquarters offices. We hope that you will agree with this summary, and that we can move forward with these shared understandings.

### Jurisdiction

- The CCC and CSP recognize that CSP has a mandate and responsibility to provide and manage public access and recreation, as well as manage natural resources, in coastal state parks. The CCC recognizes the fundamental role that CSP plays in maintaining the coastal park system, including managing the hours of operation, regulating the modes of visitation, providing amenities, and assuring a safe environment for all visitors.
- The CSP and the CCC recognize that the Commission and local government also have an important role and statutory responsibility to protect and provide maximum public access and recreation in the coastal zone, including in State Parks, pursuant to the California Coastal Act and certified Local Coastal Programs (LCPs). This includes implementing a permit requirement for any development that is not exempt.

### Regulatory Process

- CSP will endeavor to consult with the CCC and/or local government in advance of undertaking development that may trigger coastal development permitting requirements under the Coastal Act or a certified LCP. When permits are required, CSP will work with the CCC and local governments to identify and provide necessary information and meet any other relevant processing requirements. The CCC will endeavor to coordinate with CSP and local governments acting under their LCPs where appropriate.

- The CCC will endeavor to provide timely and clear feedback on CSP requests about proposed development in the coastal zone. The CCC will also endeavor to exercise administrative discretion to maximize opportunities for permit streamlining and avoiding unnecessary regulatory procedures.
- The CCC and CSP will endeavor to seek agreement wherever possible on proposed development projects through collaborative project review and design.

### Shoreline Access

- CSP and CCC are committed to and bound by the state Constitutional article X, sections 4 and 7, in spirit and intent, and Coastal Act sections 30210-30214 requirements to provide maximum public access and recreation for all the people to and along the state's shoreline waters, consistent with public safety and the need to protect natural resource areas from overuse.<sup>1</sup>
- CSP agrees to work with the CCC to identify and address any shoreline access issues that may exist in coastal state parks (e.g. related to existing curfews or beach closures), consistent with the previous bullet point.

### Lower-cost Access and Recreation

- The CCC acknowledges that the CSP has many low-priced passes available to enhance public access to coastal state parks, including: *Annual Day Use Pass*, *Golden Bear Pass*, *Limited Golden Bear Pass*, *Disabled Discount Pass*, and *Distinguished Veteran's Pass*. These five passes provide discounted rates to routine park visitors, seniors, low-income visitors, disabled people, and service men and women, respectively. CSP and the CCC will work to identify and implement actions to protect and encourage lower-cost access and recreational opportunities for all visitors to the coastal state parks, consistent with Coastal Act section 30213 and applicable CSP authorities.

### Parking Fees and other Revenue-generation Programs

- The CCC recognizes that CSP must have sufficient revenues to maintain public access and recreation opportunities at state coastal parks, and the CCC recognizes the recent specific legislative and administrative direction to CSP to create new revenue streams to fund facility management and operations throughout the State Park system.

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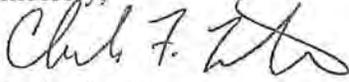
<sup>1</sup> Section 4 states, in part, "[n]o individual, partnership, or corporation, claiming or possessing the frontage or tidal lands of a harbor, bay, inlet, estuary, or other navigable water in this State, shall be permitted to exclude the right of way to such water whenever it is required for any public purpose . . . and the Legislature shall enact such laws as will give the most liberal construction to this provision, so that access to the navigable waters of this State shall be always attainable for the people thereof. Section 7 states: [w]henver any agency of government, local, state, or federal, hereafter acquires any interest in real property in this State, the acceptance of the interest shall constitute an agreement by the agency to conform to the laws of California as to the acquisition, control, use, and distribution of water with respect to the land so acquired."

- CSP and the CCC will work collaboratively to assure that any new or increased parking or other program fees are implemented consistent with the Coastal Act and/or certified LCPs where applicable. CSP recognizes that LCPs establish requirements unique to specific locations and contexts. To address Coastal Act and LCP policies, and potential impacts to public access from new or increased fees, CSP agrees to consider incorporating the following approaches in any proposed fee programs:
  - Provide hourly rates at every facility where parking fees are charged. This will provide maximum flexibility for users, potentially create more turnover of visitors (especially at sunset), and may also increase revenue, as the recent experience in San Diego and Orange County suggests.
  - Consider supplemental means that increase visitation including extending park hours, parking lot hours and operations.
  - Reduce or eliminate fees during off-peak periods.
  - Provide some areas within parking lots for short-term free parking for brief stops.
  - Limit the number of higher fee holidays per year, and include hourly holiday rates.
  - Expand and promote the sale of annual regional passes, and discount rates for seniors, the disabled, veterans and low-income persons.
  - Regulate hours and use of developed facilities, but do not prohibit all access to public trust lands such as the shoreline.
  - In areas where fees have not been charged historically, consider a phased approach for new fees, including limiting parking fees to a portion of the day (e.g., 9-5, 10-6, etc.) or weekends only; consider free parking on certain days and a "first hour free".
  - Consider whether in some cases the appropriate fee for a specific site may be no fee, for example where a state beach may be the only meaningful point of public access in a region, and/or those sites with minimal or no active management requirements or public facilities (such as facilities with no restrooms, campgrounds or visitor centers) and that can be "subsidized" by fee collection from the larger region.
  - Address any closures or restrictions on actual access to and along the beach/shoreline that may be in place.
  
- The CCC acknowledges and appreciates CSP's agreement to monitor and periodically review the implementation of any proposed fee programs, including assessing the impacts, if any, on coastal access, and annually report to the Commission available and relevant monitoring data and evaluation, including but not limited to: daily attendance, fee implementation (e.g. mode of fee), impacts to public access, and other relevant data. The CCC commits to working with CSP to identify efficient and effective monitoring and analysis.

We hope that you concur that the above points provide a workable framework for continuing to move forward together to address our shared mission of providing public coastal access and recreation. As we have discussed, CSP and the Coastal Commission have a forty year history of working together to assure that our state coastal access programs are beyond compare and that

we are protecting our sensitive habitats, wetlands, and other important coastal resources. I look forward to continuing to work effectively and successfully in partnership with CSP. Please do not hesitate to contact me in the future concerning any of our mutual concerns.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles F. Lester". A long, thin horizontal line is drawn above the signature, extending from the right side of the signature towards the left, ending under the word "Sincerely,".

Charles Lester  
Executive Director



DEPARTMENT OF PARKS AND RECREATION  
P.O. Box 942896 • Sacramento, CA 94296-0001  
(916) 653-8380

Major General Anthony L. Jackson, USMC (Ret), Director

May 23, 2013

Mr. Charles Lester  
Executive Director  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

Dear Mr. Lester:

The revised applications for San Onofre State Beach, El Moro/Los Trancos, Doheny State Beach and San Clemente State Beach will be submitted by the Superintendent of the Orange Coast District. These applications were revised pursuant to the understanding that both California State Parks and the California Coastal Commission have responsibilities to protect and provide public access and recreation along California's coast. This understanding is most recently reflected in the correspondence you sent to me on May 20, 2013.

While Parks has expressed some concerns about arriving at an appropriate structure that allows both agencies to balance our responsibilities to provide public access and recreation with Parks' responsibility to generate sufficient revenues to maintain the Park system for public access and recreation, we believe the model embodied in the letter is the appropriate path forward. We are pleased to have resolved that overriding issue. While we may find there are still disagreements in the details of how to implement the model reflected in the letter, we are committed to working collaboratively in attempting to reach resolution at the staff level whenever possible.

Attached is a sample fee schedule that reflects the proposed fees for the beaches. This schedule is a sample that could be modified over the course of the five year permit subject to the parameters set forth in the May 20, 2013 letter.

Sincerely,

A handwritten signature in cursive script that reads "Anthony L. Jackson".

Major General Anthony L. Jackson, USMC (Ret.)  
Director

Attachment

APPENDIX I

**CALIFORNIA COASTAL COMMISSION INFORMATIONAL NEEDS  
REQUEST AND KEY**

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**Information Needed to Properly Analyze State Parks Sonoma County Fee Program  
March 4, 2016**

**Coastal Commission information requirements adopted April 15, 2015 (also including minor changes identified in Staff's October 21, 2015 letter)**

- 1) Baseline data on existing usage of affected parking lots and pullout areas (including those with proposed fees, and those free areas that visitors who require or desire to avoid the fees might utilize).

*Please refer to Section 1.4 of the Application Report.*

- 2) Evaluation of expected changes in usage of these parking lots and pullout areas if fees are instituted as proposed, and mitigations to address any potential reductions in access that might be engendered by the fees.

*Please refer to Section 5.5 of the Application Report.*

- 3) To the extent possible given the provisions of State law, the proposed program for use of the additional anticipated revenue generated within the Sonoma-Mendocino Coast District as a result of the proposed fee collection, including how and where the revenues would be applied, including what percentage of collected fees would be spent within areas where collected and within Sonoma County coastal parks in general.

*Please refer to Section 3.1 of the Application Report.*

- 4) To the extent possible, additional information regarding facility and amenity improvements proposed both short-term and long-term for Sonoma County coastal parks.

*Please refer to Section 3.5 of the Application Report.*

- 5) Analysis of other impacts associated with changes in user trends, including cumulative impacts, with respect to ESHA, public safety, and ADA accessibility (including within parking lots).

*Please refer to Section 5.1 of the Application Report.*

- 6) Summary of comments and responses associated with State Parks' public outreach and coordination with the County and other stakeholders.

*Please refer to Appendix D of the Application Report.*

- 7) Input from the County (including the County Sheriff's office) Caltrans, and CHP on all of the above, including their position overall on the proposed project.

*Please refer to Section 5.2 of the Application Report.*

**Additional information needed (resulting from the revised project, our site visits and meetings with State Parks, the County and the public)**

- 8) Updated project description and supporting materials for the revised project, including site plans, elevations, materials palette and renderings/visual simulations for APMs, kiosks, and related development (e.g., signs and barriers, ADA parking facilities, etc.).

***Please refer to Section 3.1 and Appendix D of the Application Report.***

- 9) Completed CEQA document, including responses to comments received (note that CCC regulations require a copy or summary of the CEQA document, including responses to significant environmental points raised during the CEQA process (CCR Section 13057).

***Please refer to Appendix B and Appendix C of the Application Report.***

- 10) Information on budgeting and how revenues could be applied to Sonoma Coast in a simplified/easy to understand format (see also numbers 3 and 4 above).

***Please refer to Section 2.5 and Appendix B of the Application Report.***

**See Section**

- 11) Summary of DPR consultation with Native American representatives, including potential changes to address Native American concerns.

***Please refer to Section 5.4 of the Application Report.***

- 12) Summary of DPR consultations with specific user groups, including potential changes to address user group concerns. (User groups include but are not limited to rock climbers, hikers, mountain bikers, educational groups, at risk kids groups, clean up groups, seal colony protection groups, etc.).

***Please refer to Section 2.8 of the Application Report.***

- 13) Details associated with DPR's proposed oversight group, including its membership and how it would be designed to operate to inform DPR processes.

***Please refer to Section 3.7 of the Application Report.***

- 14) Information regarding proposed nighttime operations (e.g., will parks be closed at nights, and how will that be implemented and enforced if so).

***Please refer to Section 3.5 of the Application Report.***

- 15) Specific information on how the APMs and kiosks will work for credit/debit cards as well as cash and check, and the type of user data that will be collected by APMs and kiosks.

***Please refer to Section of the Application Report.***

- 16) Details regarding proposed joint or shared management of Willow Creek facility (including details of shared responsibilities, finances, future improvements, etc.). Why is Willow Creek being included in this application?

***Please refer to Section of the Application Report.***

- 17) Additional specificity on County and DPR pass programs, including low income passes, and the manner in which these programs can or will be integrated for Sonoma coast parks.

*Please refer to Section of the Application Report.*

- 18) An evaluation of the potential to offset potential fee impacts through the use of some local free days; group passes for Native Americans, educational groups, at-risk kids, clean-up volunteers, marine mammal rescuers, etc.; etc.

*Please refer to Section of the Application Report.*

- 19) Summary of DPR's fee programs by County to be able to understand how Sonoma County fits into the mix (e.g., are fees imposed at State coastal parks in Mendocino, Humboldt, and Del Norte? If so, please describe the fee programs there. If not, why are fees not being proposed there?).

*Please refer to Section of the Application Report.*

### **Unsettled points**

- 20) The current project is much different than the project that went through the local process and was appealed. That project was for a series of metal tubes without consideration of a fee schedule, where it was implied that fees would be the next logical step at some point in the future. The current project is for kiosks, APMs, and related development, along with a fee program. There is a question as to whether the current project can be properly before the Commission in de novo review in this case, or whether it is so different as to need to go through a local CDP process.

*Project no longer entails kiosks and entry stations. The project now being proposed is a reduced scale project from the original application submitted to Sonoma County for a Coastal Permit.*

- 21) If the current project can be properly before the Commission, the Willow Creek portion of the project was not before the County, nor before the Commission in the substantial issue hearing. There is a question as to whether the Willow Creek project can be properly before the Commission in de novo review in this case, or whether it is a new project that needs to go through a local CDP process. Such issues are compounded by fact that it includes County land and has not received any sort of local approval (as is required for projects considered by the Commission).

*Project no longer encompasses the Willow Creek and Freezeout Creek sites. Therefore, this comment is no longer applicable to the project.*

- 22) If the current project can be properly before the Commission, the Campbell Cove portion of it is located in the Commission's retained permitting jurisdiction, and would require a separate CDP (or a consolidated CDP) from the Commission. It is not clear that such an application could be properly before the Commission as it would require evidence of local approval (and in case of consolidation, agreement by the County to use that process).

*Comment noted. Campbell Cove is no longer included in this project proposal.*

## **Relevant Coastal Act Policies:**

### **Section 30210 Access; recreational opportunities; posting**

*In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

### **Section 30212 New development projects**

*(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or, (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.*

*[...]*

*(c) Nothing in this division shall restrict public access nor shall it excuse the performance of duties and responsibilities of public agencies which are required by Sections 66478.1 to 66478.14, inclusive, of the Government Code and by Section 4 of Article X of the California Constitution.*

### **Section 30212.5 Public facilities; distribution**

*Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.*

### **Section 30213 Lower cost visitor and recreational facilities; encouragement and provision;**

*Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.*

### **Section 30214. Implementation of public access policies; legislative intent**

*(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:*

*(1) Topographic and geologic site characteristics.*

- (2) The capacity of the site to sustain use and at what level of intensity.*
- (3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.*
- (4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.*

### **Section 30240 Environmentally sensitive habitat areas; adjacent developments**

- (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
- (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

## **Relevant LCP Policies**

### **Access Plan General Recommendations**

- 1. Adopt the Access Plan as the primary policy on access to the Sonoma County shoreline.*
- 7. Utilize the Development Criteria for Access Facilities in designing and constructing new or expanded accessways.*
- 8. Conduct visual analysis prior to siting parking areas for accessways.*

### **Access Plan Descriptions and Recommendations**

#### ***17. Salt Point State Park - Improved***

*Discussion: See Recreation Plan*

#### ***33. Russian Gulch Northern Access - Existing and Proposed***

*Discussion: An existing trail leads from Russian Gulch over the hill to the cove to the north. This trail makes access along the beach from the Eckert acquisition to Russian Gulch possible. Part of the trail is on State property and part is on the Black Ranch.*

*Recommendations: Acquire remainder of the access trail. Construct safe trail.*

**34. Russian Gulch - Dedicated and Undeveloped**

*Discussion: Russian Gulch has a large, attractive, accessible and heavily used beach. The lack of restrooms presents a health hazard, as well as an inconvenience.*

*Impromptu highway parking can create traffic hazards. For additional information and recommendations, see Recreation Plan.*

*Recommendations: Develop parking area. Construct restrooms. Utilize new facilities as a roadside rest area.*

**43. Goat Rock River Access - Dedicated and Improved**

*Discussion: The beach at the mouth of the Russian River is accessible from Goat Rock parking area at the Sonoma Coast State Beach.*

*Recommendations: No change.*

**46. Goat Rock Ocean Access - Dedicated and Partially Improved**

*Discussion: Four accessways are available from Goat Rock Road.*

*Recommendations: No change.*

**47. Shell Beach Bluff Trail - Dedicated and Undeveloped**

*Discussion: A blufftop trail from Shell Beach northward would connect Shell Beach to Goat Rock and provide a unique hiking experience.*

*Recommendations: Construct and formalize new trail, No new support facilities needed*

**48. Shell Beach - Dedicated and Improved**

*Discussion: State Parks operates this accessway to Shell Beach. A safe trail, parking for 40 cars, and restrooms are available. Lateral access between Shell Beach and Wright's Beach is hindered only by one bluff promontory. A staircase up and over this bluff would allow hiking along nearly 2 miles of beach.*

*Recommendations: No change in vertical access. Develop a trail connection and staircase, as appropriate between Shell Beach and Wright Beach.*

**55. Portuguese Beach - Dedicated and Developed**

*Discussion: State Parks operates this accessway. A trail and parking area are available.*

*Recommendations: No change.*

**56. Sonoma Coast State Beach - Portuguese Beach to Salmon Creek - Dedicated and Developed.**

*Discussion: Between Portuguese Beach and Salmon Creek are six beaches and access points operated by State Parks: Schoolhouse, Carmet, Arched Rock, Coleman, Miwok, and North Salmon Creek Beaches. Trail and parking areas are available. For additional information and recommendations, see Recreation and Transportation Plans.*

**57. South Salmon Creek Beach - Dedicated and Partially Improved**

*Discussion: South Salmon Creek is one of the most important and heavily used beach access points on the Sonoma County Coast. Existing parking is inadequate, and roadside parking is incompatible with residential uses. Heavy usage has resulted in damage and destabilization to the dunes.*

**60. Bodega Head - Dedicated and Partially Developed**

*Discussion: Numerous trails, roads, two parking areas, and restrooms are located at Bodega Head. For additional information and recommendations, see Recreation Plan.*

**Recreation General Recommendations**

- 1. Prepare a long range General Plan for each State and County park unit in conjunction with park development planning.*
- 7. Design parking and restroom facilities to serve only the planned intensity of recreation development.*
- 9. Locate parking in visually screened areas.*
- 11. Encourage State Parks to take immediate action, including adequate staffing and necessary physical measures, to protect the natural and cultural resources of new acquisitions.*

**Public Recreation Recommendations**

***Salt Point State Park Unit -Salt Point State Park***

- 21. Develop two types of facilities, each to accommodate 30-60 persons, east of the highway: a campground oriented toward horseback riding, and a campground*

*oriented toward hike-in camping. These campsite areas should be accessible to the public only by horseback or hiking.*

*22. Designate new and existing trails with signs and provide interpretation of the natural environment. Designate the trail from the intersection of the existing riding and hiking trail and Highway 1 to the bluff in a westerly direction. Designate specific trails in this and other locations where use now occurs in an informal manner, to help preserve the park's sensitive resources.*

*23. Encourage the development of trails recommended in the Access Plan and various facilities approved by the Coastal Commission.*

#### ***Sonoma Coast State Beach Unit - Sonoma Coast State Beach***

*44. Encourage development of a visitor center in the vicinity of Salmon Creek or the Bodega Dunes campground. Interpretive facilities and material should include warning of the hazards of the Sonoma coast.*

*45. Encourage development of a nature trail west of Highway 1 at the Salmon Creek marsh.*

*46. Complete State beach inholdings to the degree possible at Pacific View Estates and parcels 101-13-11, 2 and 3.*

*47. Encourage the development of trails recommended in the Access Plan and parking facilities recommended in the Transportation section.*

#### ***Sonoma Coast State Beach Unit - Bodega Head***

*51. Limit development to improvement of existing facilities, such as improved parking, restroom, and picnic facilities. Trails for sightseeing and diving access should also be considered.*

*52. Encourage development of the trail recommended in the Access Plan.*

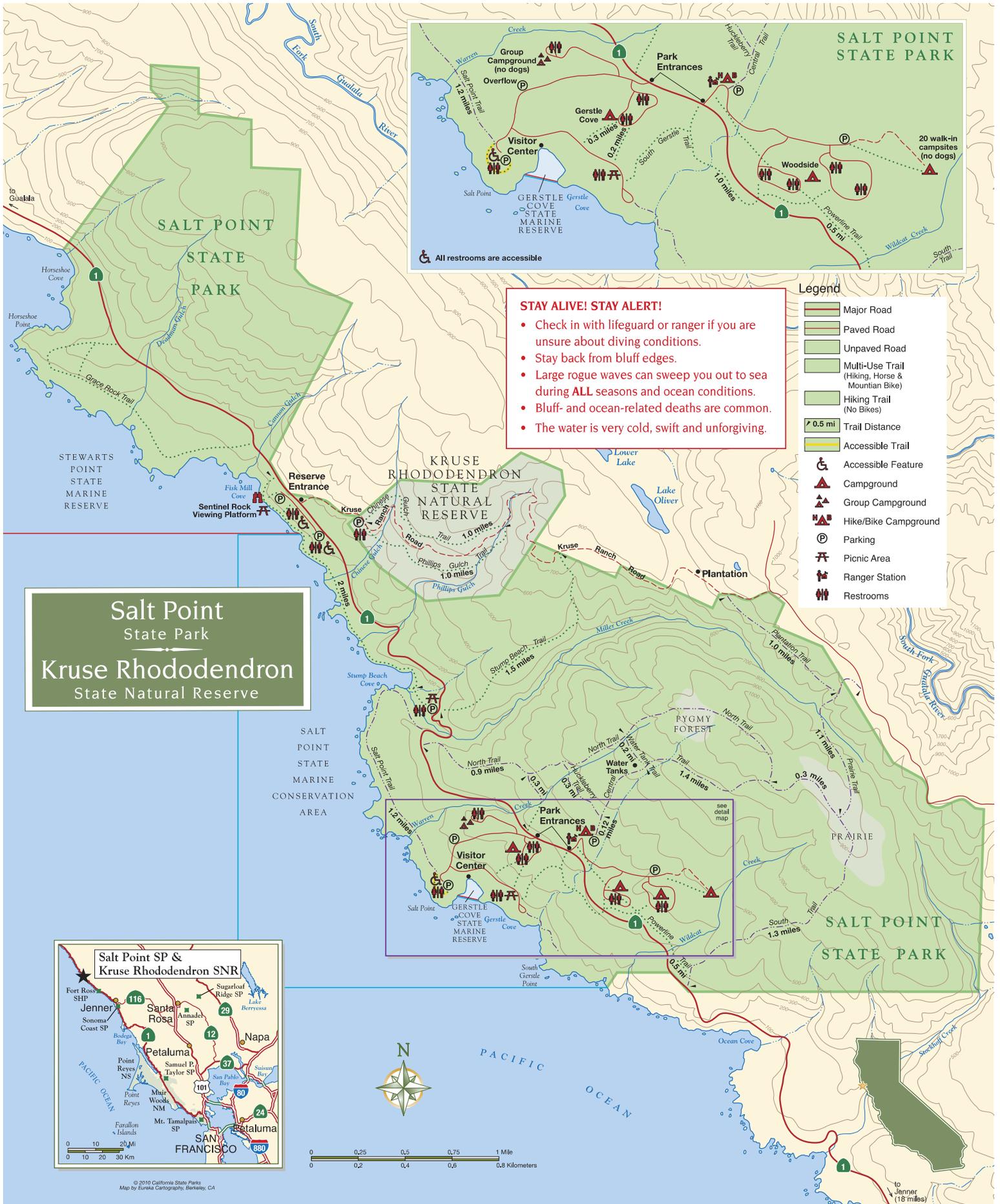
*53. All fencing except that needed to prevent access to the Hole in the Head should be removed. Continuation of salmon-rearing program in the pond should be considered.*

#### ***Sonoma Coastal Trail Recommendations***

*56. Encourage a coastal trail along the beach, the coastal terrace, the uplands, the ridge roads, or the highway to connect public and private recreation areas and access trails with communities and commercial services.*

*57. Encourage increased provision of facilities for storing bicycles and camping equipment at campgrounds designed for bicyclists and hikers.*

*58. Provide reduced rates for campers arriving by bicycle or foot.*



**STAY ALIVE! STAY ALERT!**

- Check in with lifeguard or ranger if you are unsure about diving conditions.
- Stay back from bluff edges.
- Large rogue waves can sweep you out to sea during ALL seasons and ocean conditions.
- Bluff- and ocean-related deaths are common.
- The water is very cold, swift and unforgiving.

**Legend**

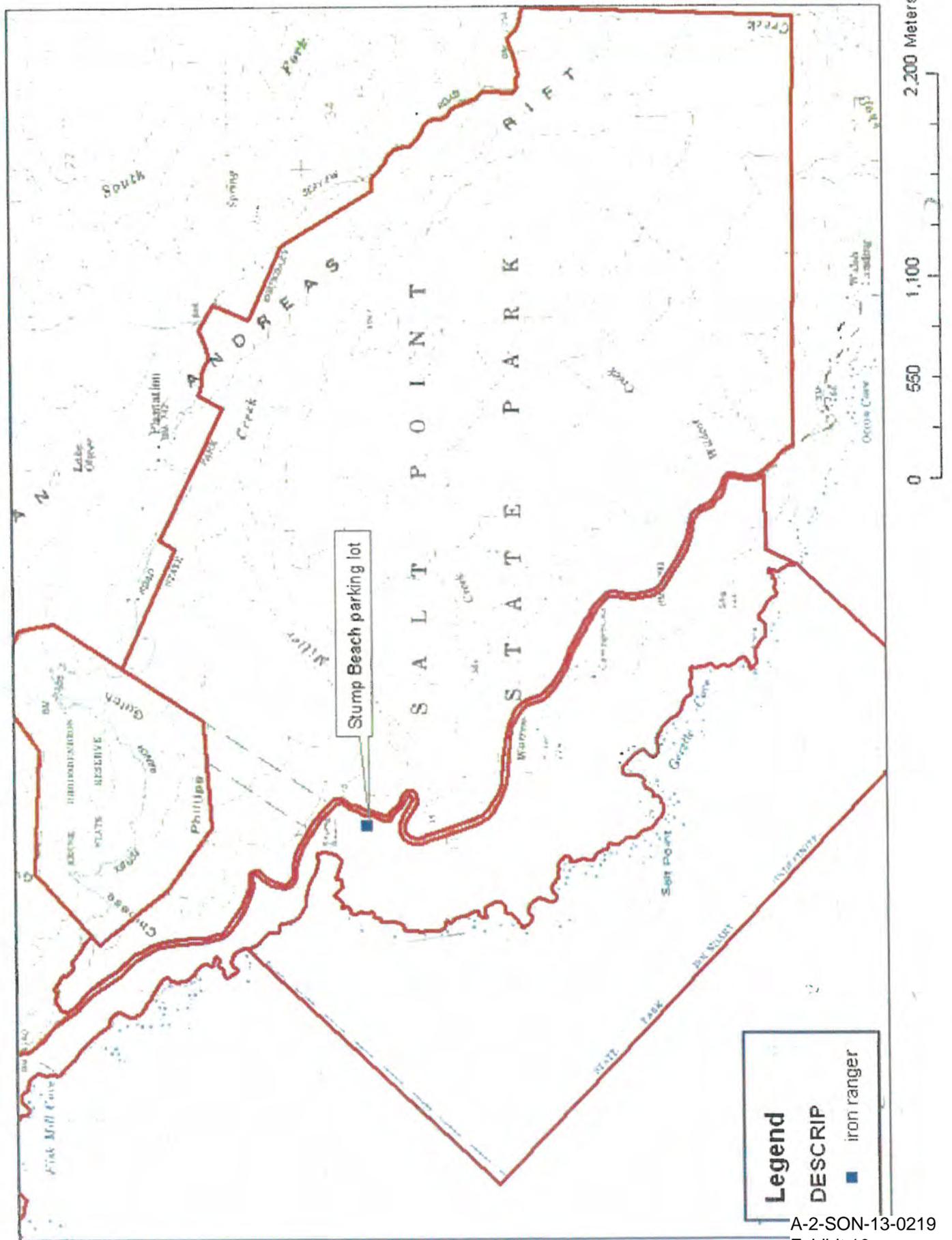
	Major Road
	Paved Road
	Unpaved Road
	Multi-Use Trail (Hiking, Horse & Mountain Bike)
	Hiking Trail (No Bikes)
	Trail Distance
	Accessible Trail
	Accessible Feature
	Campground
	Group Campground
	Hike/Bike Campground
	Parking
	Picnic Area
	Ranger Station
	Restrooms

Salt Point State Park  
 Kruse Rhododendron State Natural Reserve



This park receives support in part through a nonprofit organization. For information contact Fort Ross Interpretive Association, 19005 Coast Highway 1, Jenner, CA 95451 (707) 847-3437 • [www.fortrossinterpretive.org](http://www.fortrossinterpretive.org)

# Salt Point State Park - Proposed Iron Ranger Location



COUNTY OF SONOMA  
BOARD OF SUPERVISORS

575 ADMINISTRATION DRIVE, RM. 100A  
SANTA ROSA, CALIFORNIA 95403

(707) 565-2241  
FAX (707) 565-3778



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JAMES GORE

March 31, 2016

Jack Ainsworth, Acting Director  
Supervisor Steve Kinsey, Chairman  
Coastal Commissioners  
California Coastal Commission  
45 Fremont, Suite 2000  
San Francisco, California 94105

Delivered electronically: [nancy.cave@coastal.ca.gov](mailto:nancy.cave@coastal.ca.gov)

**RE: Application A-2-SON-13-0219 (California Department of Parks and Recreation, Sonoma Co.)**

Dear Mr. Ainsworth, Chairman Kinsey, and Commissioners:

Please accept this letter as the County of Sonoma's response to the above referenced project. In summary, while the revised proposal reduces from 14 to 8 the number of parking lots at which fees would be charged, the project still violates the California Constitution, the Public Resources Code and the Local Coastal Program (LCP) for Sonoma County by restricting public access to collect revenue instead of protection of natural resources or private property. Alternatively, should the Commission decide to authorize some version of the project, the County would require an amendment to its LCP where changes in public access at six of the sites is prohibited specifically.

Article X, Section 4 of the California Constitution ensures that "access to the navigable waters of this State shall always be attainable for the people thereof." Public Resources (Coastal Act) Section 30210 specifies that, in implementing this constitutional mandate, "maximum access ... shall be provided for all people consistent with public safety needs and the need to protect public rights, protection of private property rights, and protection of natural resources from overuse."

Public Resources (PRC) Section 30210 imposes four limitations on the maximum coastal access requirement: 1) public safety; 2) protection of public rights; 3) protection of private property rights; and 4) protection of natural resource areas. The Board of Supervisors, as the author and protector of the LCP, has found that revenue generation alone does not justify limiting maximum coastal access because it is not germane to the enumerated factors.

PRC Section 30214 provides that maximum coastal access limitations must be based on facts and circumstances of each case, including: 1) topography and geologic site characteristics; 2) site capacity to sustain the proposed use; 3) fragility of natural resources; 4) proximity to residences; 5) privacy protection for private property owners; and 6) protection of aesthetics by providing for litter collection. All six factors above concern site limitations and problems. Neither Section 30210 nor Section 30214 list revenue generation as a rationale for limiting maximum coastal access. The Board has determined that State Parks has made no showing that any of the Section 30210 or Section 30214 factors necessitate the project, particularly fee collection. Instead, the Board found the proposed regulated access limitations and fees would result in a threat to public safety by causing people to abandon safe fee-entry parking lots in favor of parking along dangerous bluffs. Further, even if visitors may manage to safely exit vehicles, the most direct path to beaches

would be traversing and damaging environmentally sensitive and eroding bluffs. Therefore, the proposal would conflict directly with three of the factors without qualifying for one of them.

PRC Section 30213 provides, "Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided...." Unlike urban settings where public transit provides a viable alternative to autos as a means of reaching the coast, there is no viable Sonoma County daily bus service to the coast. Therefore, visitors must use automobiles to reach the Sonoma County coast. The parking fees that will result from the Project will be entirely new fees, not merely increased existing fees, adding to the cost of driving to the coast. New fees will have the effect of eliminating existing lower cost visitor and recreation facilities (i.e., the existing free parking lots). The Board has found that the Project and its associated new parking fees will adversely affect the availability of lower cost visitor and recreation facilities and negatively impact access to and use of the beaches. The Board therefore finds that the Project and its associated new parking fees are inconsistent with the requirements of Section 30213.

PRC Section 30240(b) specifies, "Development adjacent to ... parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those...recreation areas." The project and its associated new parking fees have the potential to cause the diversion of visitors from the new fee-entry parking lots to nearby free parking outside the lots. This could result in damage to sensitive natural resources as people create new trails to the beaches. In addition, fee parking also will divert visitors to free parking in areas where the State cannot charge for parking but where coastal access exists. Consider County-owned Pacific View Road, and its 66 public spaces that serves as access to private residences and Shell Beach. Instead of paying a fee at one of the seven other locations, it is reasonable to assume that visitors will flood locations such as these, causing congestion, safety hazards, impacts on private properties, and littering since there are no trash facilities on this small street. State Parks has not presented a detailed plan for assessing and monitoring these potential impacts. The Board therefore finds that the Project and its associated new parking fees are inconsistent with the requirements of Section 30240(b).

The Board has determined that the project does not conform to the LCP, certified by the California Coastal Commission in 2001. The LCP contains an Access Plan delineating existing and proposed access ways for an overall coastal access system for the Sonoma Coast. The Access Plan includes a description of and policies for each access way and references all sites included in the project. In some cases, the references are specific. In other cases, the references are to the Recreation Plan in the LCP. The LCP specifies that no change is allowed to the parking and access at Stump Beach, Goat Rock – Blind Bleach, Goat Rock – South Lot, Goat Rock – North Lot, Goat Rock – Arched Rock, Shell Beach, and Portuguese Beach. The Board finds that the proposed project and its associated new parking fees are inconsistent with the LCP and that an LCP amendment would be required for the project to proceed. Review of the project indicates that State Parks has not applied for an LCP Amendment.

For the reasons specified above, The Sonoma County Board of Supervisors respectfully requests that the Coastal Commission deny the application for a Coastal Development Permit and preserve maximum coastal public access consistent with the State Constitution and the State Coastal Act. Thank you for your thoughtful consideration in this matter.

Respectfully,



EFREN CARRILLO  
Chair, Sonoma County Board of Supervisors

CC: Sonoma County Board of Supervisors  
Veronica Ferguson, County Administrator  
Tennis Wick, PRMD Director  
Bruce Goldstein, County Counsel

RECEIVED

3-14-16

MAR 29 2016

CALIFORNIA  
COASTAL COMMISSION  
NORTH CENTRAL COAST

To Whom it may concern -

Dear Coastal Commission, please do not allow the California State Park System to charge fees to enter our Sonoma County Beaches that are now free to enter. Our California taxes should be used to keep our beaches open to all on an equal economic basis. "Do the Right Thing" and keep our beaches free to the public. The whole United States needs to move back to equal opportunities all on levels of life in our society - lead the way!

Sincerely, MARCI HOARD (Teacher)

A-2-SON-13-0219

Exhibit 11

Public Correspondence

Page 3 of 476

2

Dear Coastal Commission, 3.17.16

I am Angelina DeMartini. I am 11 years old and in 6<sup>th</sup> grade at Salmon Creek Elementary/Middle School. I have heard about the issue. I think you should not do it because I am a poor family and we like going to the beach. My reasons are that I preposed that there are going to be fights and people are going to not like you. Not trying to be mean or anything but there are going to be ~~issues~~ issues.

all most everybody is going to be agitated  
You. I know that your in debt  
and need money so I have a  
proposition I know that this is  
not in your power but to raise  
the price on candy so not alot  
of people could buy it because  
Sugar is the main reason  
people are fat. I know  
this sounds stupid but you  
wont get alot of money  
but that will solve another  
problem in California. Another  
solution is to pay people  
that get to much money a  
little less so you can have a  
little more.

Sincerely,

ANGELINA

Make the world happy! ♥  
(I forgot)

Also, people don't always carry money  
so they ~~don't~~ leave. Thank you for  
reading this letter and please think about  
it.

Dear Coastal Commission,

March 14, 2016

I am a 5<sup>th</sup> grader from Salmon Creek School. I disagree with the proposal to charge people to go to the beach, because, First, if a student was poor and needed to study the ocean they wouldn't be able to go to the beach, and then the parents couldn't pay for it and they would get a F. 2<sup>ndly</sup>, if a hobo really needed to go to the beach, they wouldn't be able to experience the awesomeness of the beach, and you would never want to take away the happiness. Lastly, hobos do clean up, so it would save you time!! Please take this into consideration!! 😊

P.S. People need to go more Sincerely,  
for jobs! No jobs, No  
tax money for you!!

Loya ☺  


P.P.S. You should not have to pay to have fun!! 😊

# SAVE OUR BEACHES

3/14/16

Dear Coastal Commission

I am a 5<sup>th</sup> grade student going to Salmon Creek Elementary School in Occidental. I don't think it's fair to charge beach goers \$8.00 just to go to a coastal park. There's no reason to charge so much from people who go there just to enjoy ~~the~~ nature. If you comment back to me, tell me why you want to make these people pay so much.

Email: Ztucker@hammingsd.org

A-2-SON-13-0219

Exhibit 11

Public Correspondence

Page 8 of 76

Zoe Odette Gray-Tucker

Address: 516 Goodman Ave.  
Santa Rosa

Dear Coastal Committee

Tristan

Hi my name is Tristan I do not agree with charging \$4 dollars because reason one is that I like going to the beach and I don't want to pay 4 dollars to get in. Two is that what if some body comes from Sacramento to a beach but they <sup>person</sup> don't have a <sup>more</sup> money so they can't go to the beach.

~~ADDITIONAL REASONS THAT~~

~~IF THEY DON'T HAVE MONEY~~

~~WHAT~~

Date. 3/14/16

Dear Coastal Commission I am a 5<sup>th</sup> grader at Salmond creek School my name is Syris pally and I am 11 years old. I think the law to charge eight dollar to access are beaches of Sanoma county is a good idea if the money is going in to deening our beaches but if the money is going to something like war I think it is a terrible idea

one of the reasons is if someone does not have enuf money to pay the fee of eight dollars its not fare to them because they can no access the beaches. I think we should not have to pay to goto our own beaches! please make the right chose and dont fee us money to goto our beches.

Thank you

Dear Nassau Commission,  
I am a 6th grade student,  
and I do not like the  
way you miss treat the coast.

You cannot just dig into earth  
and say "oh, ya this is some  
nice gravel for sidewalks/lets  
take it to build another  
building! San Francisco  
has enough buildings and  
even help we have  
enough trees! Just stop  
takeing what you don't  
need or already have.  
Be greatful for what

Mother Nature gives  
it! But if you miss  
treat it like this, than  
it shows that you do  
not care about our  
environment!

From:

Andy

note:

Don't take

what you want  
need take what  
you need, and  
be great!

Community

HECP 000000

3/1/16

P.S. Don't let this nightmare come true please!!

3-14-16

Benjamin  
Atkinson

Dear Coastal Commission,

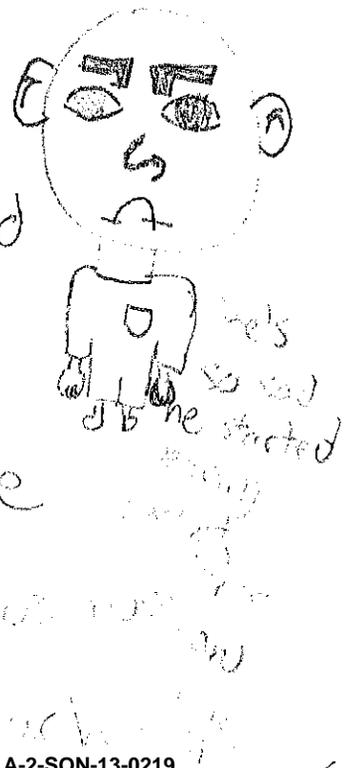
I am a 5<sup>th</sup> grade student at Salmon Creek

School, I disagree with your decision to charge \$8 each person. Here are 3 reasons why I think this is a horrible idea.

#1 We are already paying taxes for the beaches

#2 It's a dumb idea you should not pay to just have fun

#3 You are not going to make any money off of these beaches as most people are going to go to the beach anyway. I hope your horrible idea come true!!



Dear,

Dear Coastal Commission,  
I am a 3<sup>rd</sup> grader at Salmon Creek School.  
I disagree with proposal to charge people money to go to the beach because:

Reason 1: alot of people like to go to the beach every day and if you have to pay 8\$ to go the not so wealthy people will not be able to.

Reason 2: I think the beach should be a place for all people to go and if you have to pay to go everyone will not be able to go because they do not have the money.

Reason 3: So many other beaches have you pay to get in and it would be nice to not have to for some beaches.

Reason 4: 8\$ is alot of money to pay just to go to the beach.

Sincerely,

Simillia

Dear [unclear]  
I want to [unclear] and  
did ~~not~~ not ask if you  
to pay \$8 to go to  
the bank and I have  
when to [unclear]  
I don't know [unclear]  
of but I have [unclear]  
good times [unclear]  
just think a [unclear]  
[unclear] about  
much money [unclear]  
and out [unclear] think  
that just [unclear] people  
was [unclear] people  
+ with paper [unclear]

SO PLEASE DON'T  
~~DO~~ MAKE PEOPLE  
TO PAY PLEASE. I HAVE  
SINCERELY OCTAVIO



Ocean Coastal Commission  
I am a 4 year old boy in Salmon  
Creek School and I don't think  
should charge people to get <sup>you</sup> ~~at~~ <sup>the</sup> ~~beach~~  
beach because 1, most of my  
memories are from there. 2, I love  
the tide pools there. 3, I love to  
have my Birthday at the beach  
and if my friends come and  
have to pay to get in they might  
not come.

Sincerely,

Your Truly  
Landon C

Dear Coastal Commission  
I am Andrea. I am in  
third grade at Salmon  
Creek School. I disagree  
with the proposal to  
charge people's money  
to go to the beach.

Because what if  
the poor want to go  
to the beach.

I think the beach  
should be free  
because

even People with  
Money should  
not pay and I  
think it should  
be free so  
it open to  
every one

turn  
→ Page

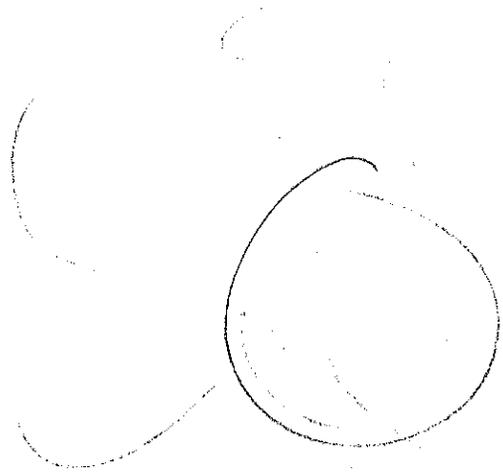
To Coastal Commission -

I am a 3<sup>rd</sup> grader at samon creek.

I disagree that we have to pay

Because we shouldn't have to  
pay for nature and what if  
a poor person wanted to come to  
the beach and they wanted be able  
to. we should not have to pay.

From, Arraya Villarreal



turn page

I don't  
know  
pay!

OK OK

EE



To Coast Commission

Dear Coast  
Commission

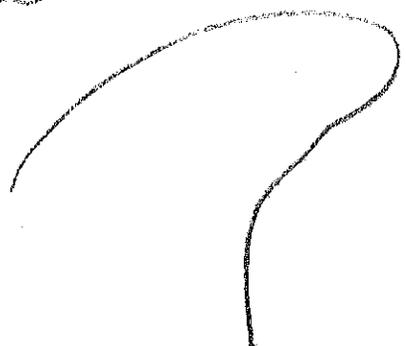
I am a third grader at Samon Creek <sup>School</sup>

I strongly disagree that we have to pay to go to the beach because it's part of nature.

Please don't make us pay. We will run out of money on hot days, mostly on summer.

-Violet Lorenzo

Please



Dear Coastal Commission I'm a 3rd grader  
at Salmon Creek and I disagree that people  
should pay to go to the beach, we already  
pay taxes, and

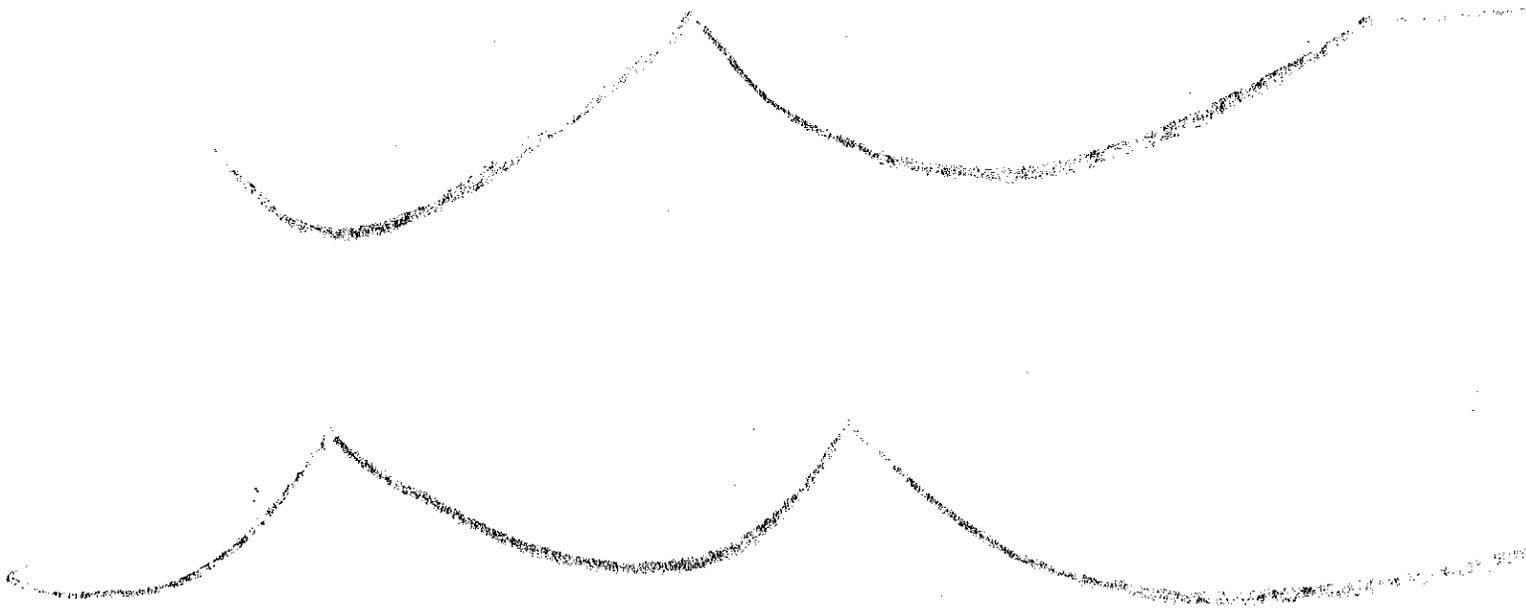
Sincerely,  
Matthew  
Hageman

Mr

Dear Coastal Commission

I am a 3rd grader at Salmon  
Creek School. I disagree  
that we should pay  
for the beach because we already  
pay taxes. So i don't think  
we should pay because we pay for  
glass too. that why i don't  
think we should

pay!  
Leheyda



To whom it may concern, I am a 3rd grader at

Salmon Creek School. I strongly disagree with the states

Proposal to charge a fee to enter the beaches for 1 reason  
we are already paying in tax money I am not going to pay a new tax  
but to find a different solution. You should not PAY FOR

NATURE !!!!!! <sup>3rd</sup> restricts access for low  
income people. If we all own the beach shouldn't pay for  
something we own #used to be free.

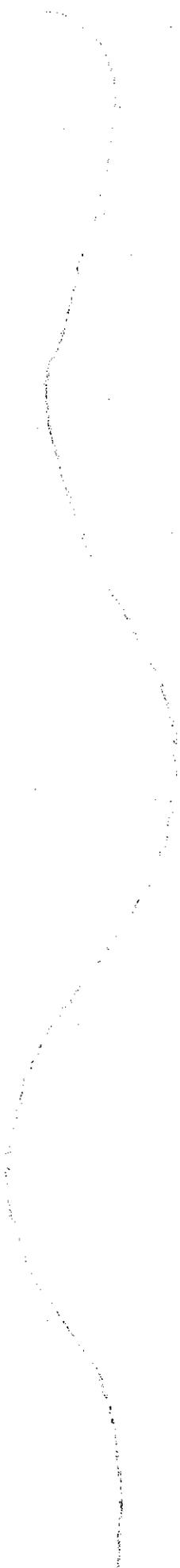
Sincerely,  
Jester age nine

P.S. #Save the beaches

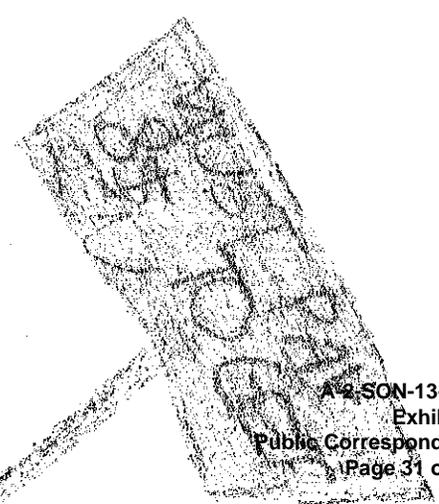


To whom it may concern I am a  
Third grader from Talm on  
Suebol I disagree that there  
be money spent on creeks  
ponds and Benoit when we  
have to pay for the  
beaches we're paying the  
Talm on

DEAR COASTAL COMMISSION  
I AM A THIRD GRADER AT  
SAMON CREEK SCHOOL,  
I STRONGLY DISAGREE THAT  
PEOPLE HAVE TO PAY FOR  
THE BEACHES THAT THEY WANT  
TO GO TO. SOME FAMILIES WANT  
MINE COULDN'T PAY EVERY DAY  
LIKE THAT THEY WANTED TO GO  
TO THE BEACH. KEEP THE BEACH  
FREE.  
BY: ZAKK



DISTRICT OF  
COLUMBIA



Dear Coastal Commission, I'm a 3rd  
grader at Salmon Creek School. I disagree that  
we should ~~not~~ have pay because we gave you  
the beaches.

From Juan

Dear Coastal Commission

3-16-16

I hope you will not make people that want to be able to go out to pay 2 \$ to enter the Ocean and other places.

I am a 41 year old kid and from all my memories I have had

in these place that now you are making us pay for this is why I am speaking up to you to

Say that please don't make us pay to enter a beach or to go to the beach

- from - A 5th grader

Felipe Gutierrez  
A-21504-13-0219  
Exhibit 1  
Public Correspondence  
Page 33 of 476  
school

Dom

3/16/14

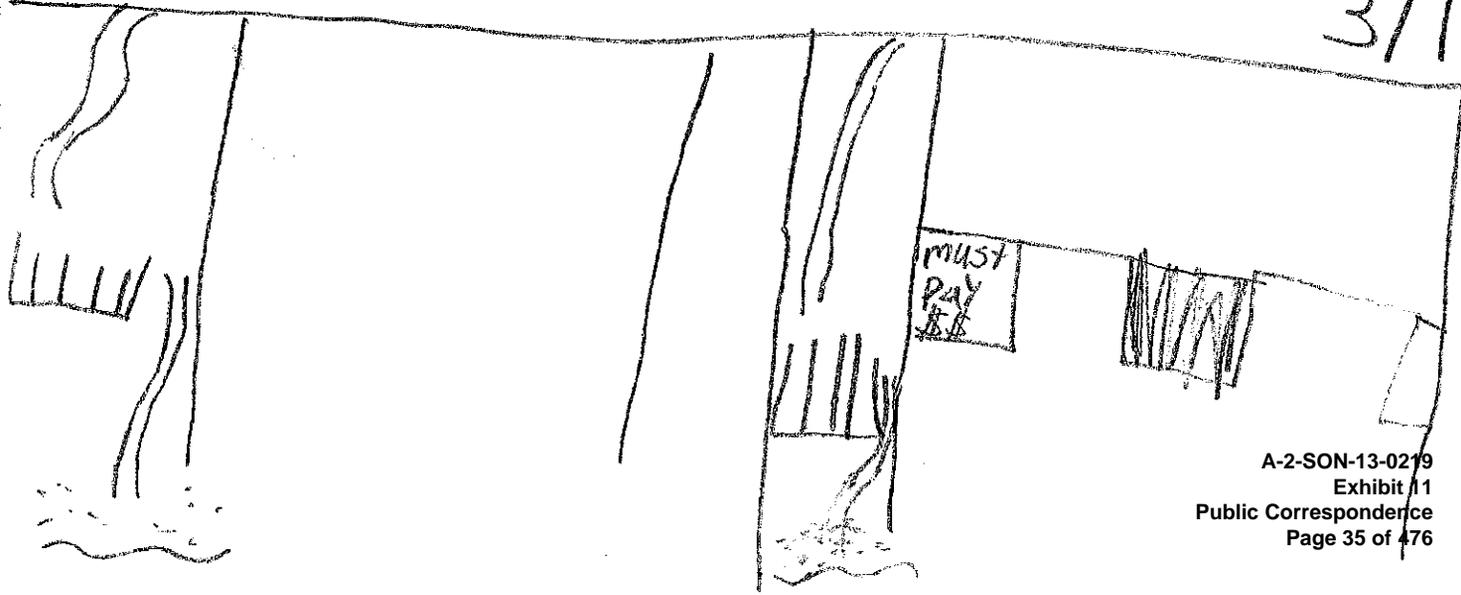
Dear Castil, Cammin,  
~~People~~ People dont have  
people pay to get in the  
Beach because wat if  
people dont have money  
and maybe their  
homeless. But if their  
are ~~the~~s people that  
pick up other peoples  
trash.

Dear Capital Commission  
we do NOT want you to  
make us pay to go to  
the beach and I know you  
won't be stupid and make  
us pay to go have fun and  
get sand and wet.

Sincerely, Bryce  
5th grade

P.S I have a ~~voice~~  
voice.

3/16/16



Dear Coastal Commission,

My name is Corinne and I'm a 5<sup>th</sup> grader in Salmon Creek School. I think that it is very wrong to charge people to go to the beach. One reason is that the beach is a sacred place that everybody's ancestors probably went to. Also, you could make a snack shack where all the trash would be biodegradable so if some one dropped it it would be fine.

Sincerely,

Corinne M. Fiden



To The Sonoma County Coastal Committee,  
please do not charge \$8 for entree fees. If you need money please charge \$5 instead of \$8. Beaches should be open to everyone, not just people who can afford it. Also, if people don't grow up visiting the beautiful beaches of Sonoma County, they won't learn to love and respect them, like me.

Sincerely,

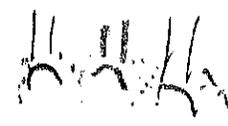
*Kaya Saporito*

Kaya Saporito

4th grade, Salmon Creek Elementary School

Dear, coastal commission

I'm 5th grade student at  
Salmon creek school. I disagree  
with this proposal because ~~who~~ made  
the beaches except mother earth.  
So there's no reason to charge  
money to get into a beach. ~~we~~  
Shouldn't have to pay to  
get to the beach at all.

Sincerely,  
Nicholas Loch. 

Nicholas Loch

Dear Coastal Commission,

I am one of 20 sixth graders at Salmon Creek middle school. This issue matters to me a lot because me and my family go to the beach every week. I would like to be able to have to pay every thing I see. Remember, this is your debt, not OURS.

Sincerely,

Vivian Frank

Dear Coastal Commission, 3/17/16

My name is Grace. I'm a 6th grader at Salmon Creek school. I think that the people in Sonoma County want to go to the beach without having to pay \$8. Most people don't carry \$8 to the beach so you would probably get less money. Since some people don't like this idea, they won't go to the beach anymore, so that means alot less money. Remember, this is your debt, not ours. Thank you for taking the time to read this letter.

sincerely,  
Grace

3-17-18

Kerry

Dear Coastal Commission,

My Name is Kerry Thompson and I am 12 y.o.

I strongly disagree with your decision to tell people when they go to the beach. I think a way you can make up your debt is ask someone who is willing to donate or do lots of fundraisers around the state.

From,  
Kerry

Dear Coastal Commission,

We know that you and your families need money, but to do our families and this new proposal of going to the beach ~~with our~~ costing money. It's making it so we can't have fun and make money. My family loves going to the beach, but we don't have much money, so if you make going to the beach cost money we want be able to go; ~~this will ruin my life completely~~

Sincerely,

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John (6th grade)



Dear Coastal Commission,

The toll booth, parking, and restroom thing. I think it isn't the best idea. I'm sure you can come up with other ways to raise money! Honestly the beach is just land and everyone should be allowed to enjoy it for free. As the Native Americans put it, "Land, sea, and air do not belong to me, belong to everyone." I hope you take this letter into account even though I am an 11 year old kid I have a voice, vote no!

**RECEIVED**

MAR 29 2016

CALIFORNIA  
COASTAL COMMISSION  
NORTH CENTRAL COAST

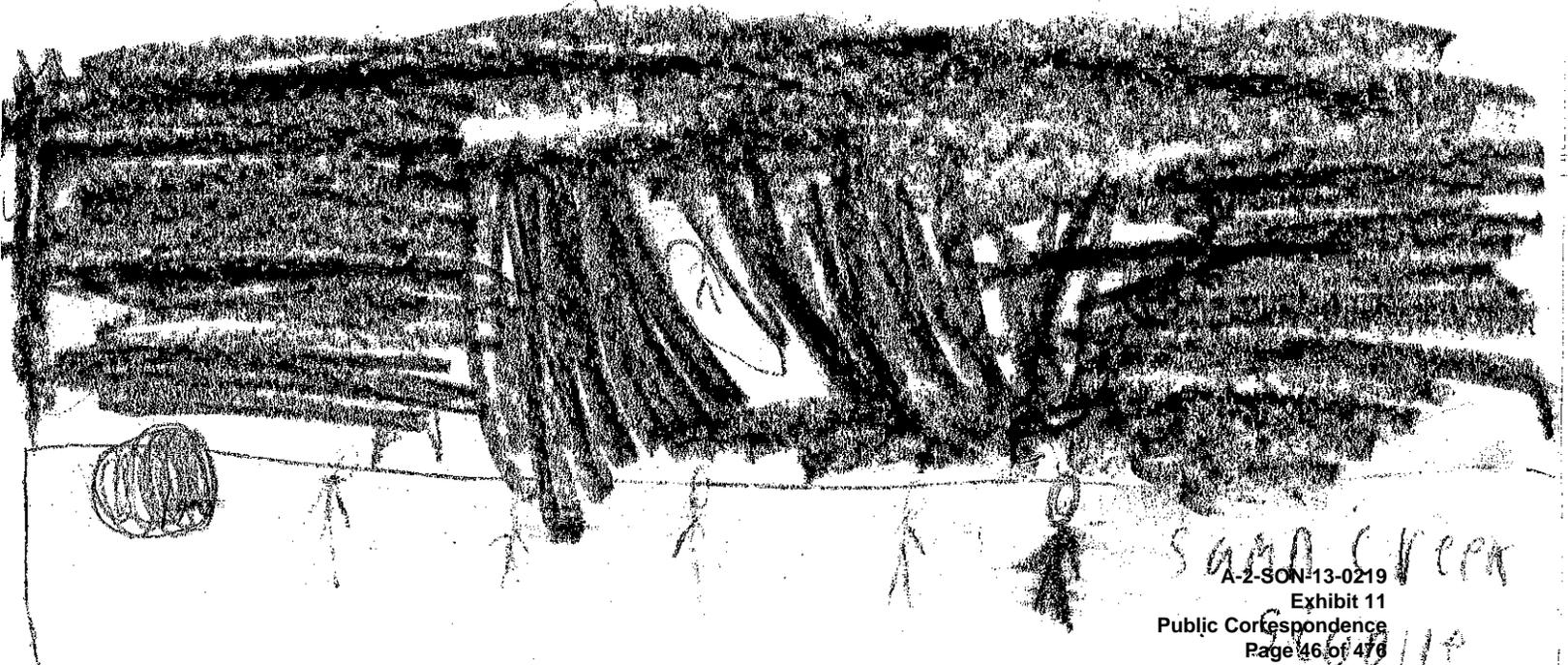
Sincerely, Walker of Salmon  
Creek School.



by River

I am River. I am in 3rd grade  
and if we ~~need~~ need to pay the  
Pool can not come to the pool.  
That is the same reason I want  
Sadersto will so the poor can go  
to college. ~~and~~ we all need  
to pay for gas to. Just try to find a  
way.

Please don't take it!  
Please don't say yes to this.



SAND CREEK  
A-2-SON-13-0219  
Exhibit 11  
Public Correspondence  
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3/14/16

Dear Coastal Commission,

I am a 4<sup>th</sup> grader at Salmon Creek School. I don't think that it is fair for you to charge people to use the beach. It's not fair, because the beach has always been for the people, for free. To me, it sounds like you are being bossy. Please keep the beaches free!

Sincerely, F B Fiona

**RECEIVED**

MAR 29 2016

CALIFORNIA  
COASTAL COMMISSION  
NORTH CENTRAL COAST

Dear Coastal Commission

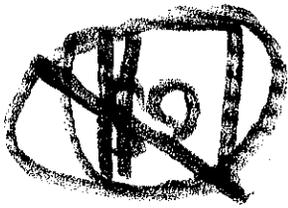
This is an OTC bag by setting up pay boxes  
at the beach. The way for it comes the  
15th of the month come for the beach so  
you can get your money



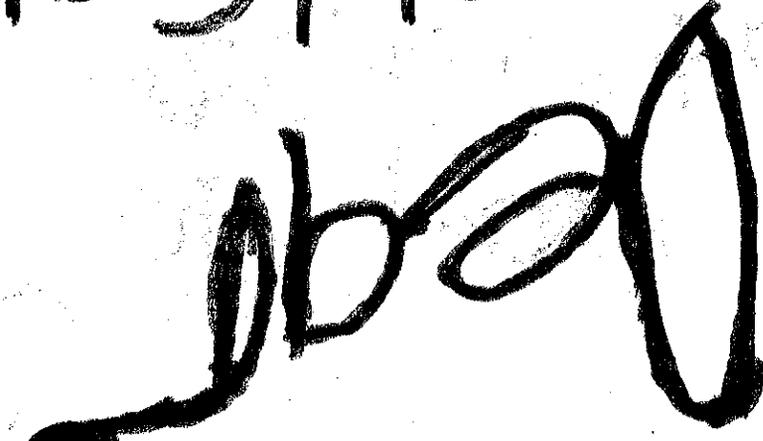
See you

Liam

Dearcc. I am mad  
that you make people  
pay money which some times  
they pay but its TO wishly  
to get out of theire  
car, and they dont get  
their money BACK



Costal Camstron

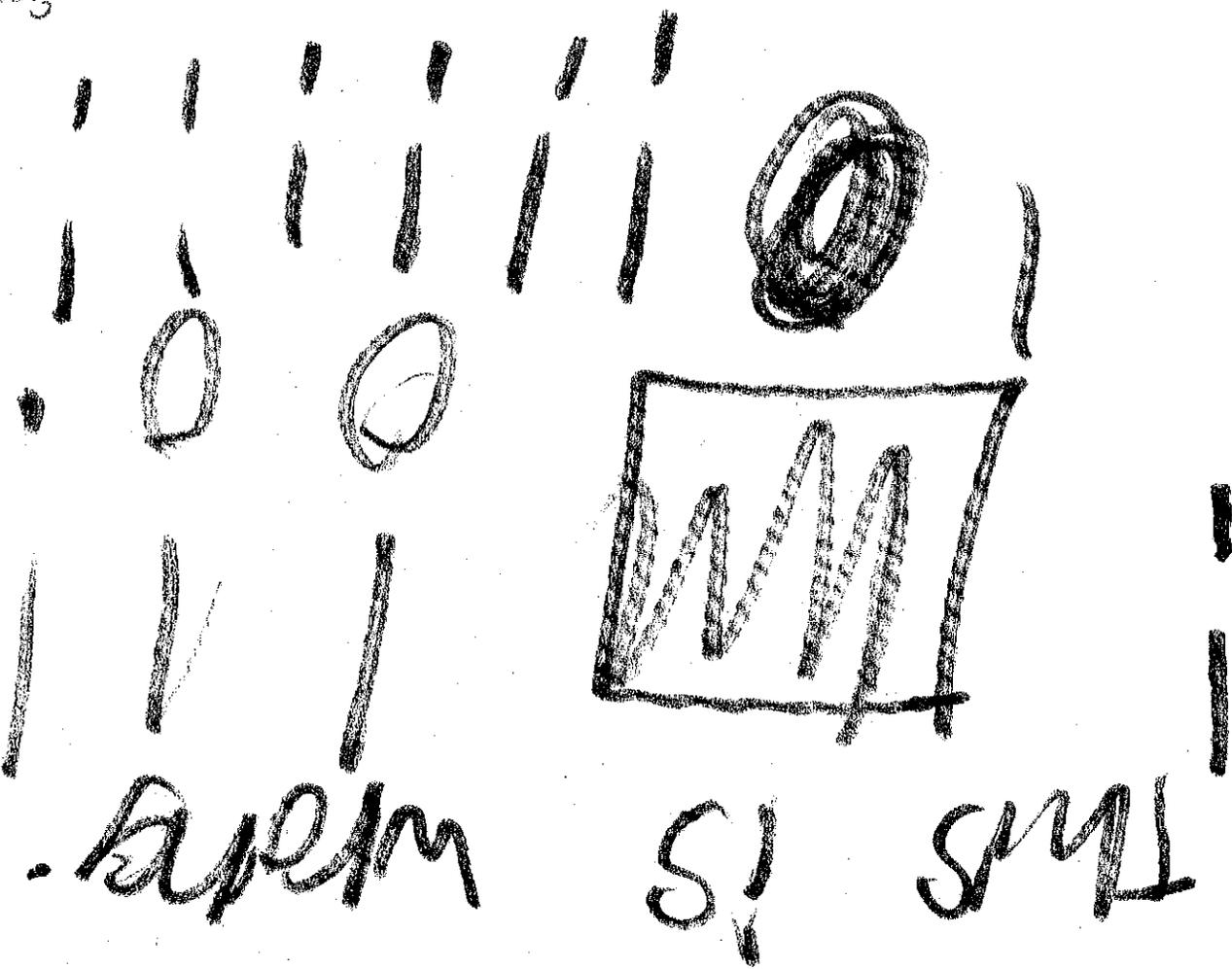


Trinisart - abt

Some people  
are so  
...  
...  
...  
...

Dear Coastal Commission  
I think what you are  
doing is wrong because  
its not fair for me and  
other people to  
pay money for going  
to a beach.

love, Sam 4th grade  
Salmon Creek  
Sch 01

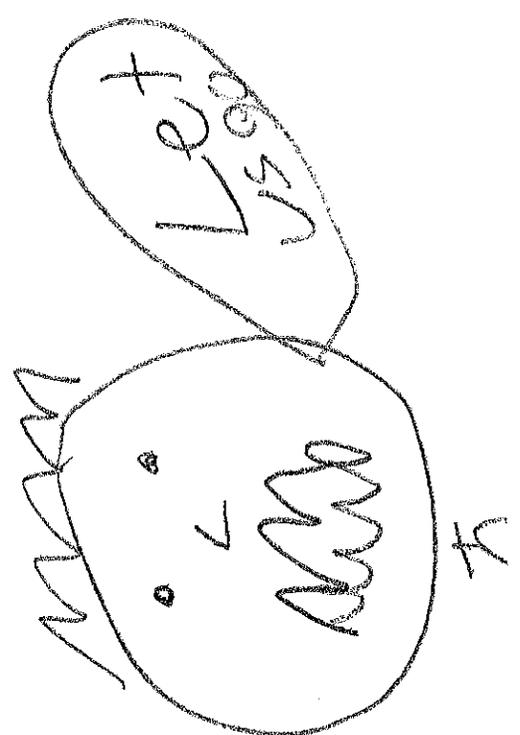
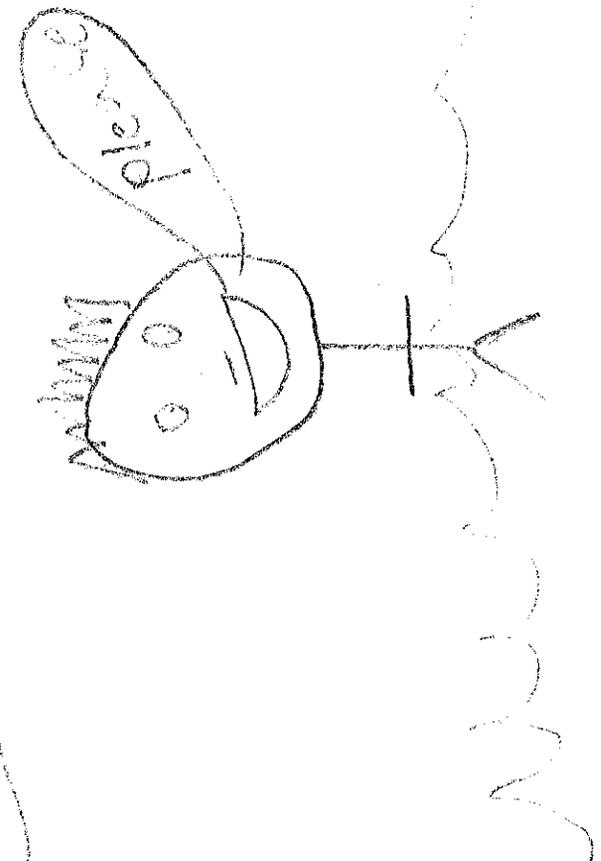
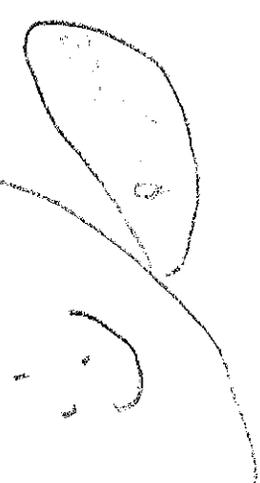


Dear Coastal Commission  
I am a fourth grader at

Salmon Creek School.  
You may not care, but I  
do. I think it is not right  
that you charge us 7 of  
whatever dollars to use our  
benches. I may be just a  
kid, but I have much  
opinion on this. Just let us  
have a good bench if you  
care!

From Jack Ginn

P.S. It would be very nice  
if you let us go to our  
benches without paying.



0 as for  
Commission

Dear coastal commissioner

My name is <sup>Year old</sup> hudson a nine in 4th grade  
at salmon creek and I think it is

not fair because if someone doesn't  
have not too much money a they  
love going to the beach and they miss it  
and money can be really sad.

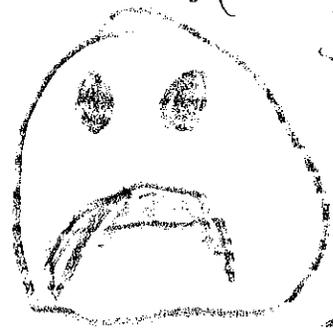


hudson

Dear Costal Commission,

I am a fourth grader at Salmon Creek School, I think that it's not fair and I am mad! I think that it won't be fair to people who can't afford it including me!!! I'm sorry I disagree but I have my own opinion. People sometimes just want a good day!

Love,  
Savanna  
Cowell  
4th grade



Dear

DEAL COASTAL COMMISSION

I am a 4th grade kid at  
Saimon Creek school and  
in my opinion you should charge the  
people who live here to go to the beach

From  
Graham  
4th grader

DEAR CONSTITUTIONAL COMMISSIONERS 3/14/16

I am a girl growing up S.C.S.

I strongly disagree to paying for

the benches because nobody  
has to pay  
Shouldn't for nature at all

NOBODY!

I also think that we  
already pay for TAXES

Sincerely, # Save the Beaches  
DeWanda

(DeWanda)



Dear Coastal Commission I am  
a 3<sup>rd</sup> grader at Salmon Creek  
school. I disagree that we should  
pay to go to the beach because it  
is unfair, it was ours before, why should  
we pay? We shouldn't pay for nature.  
We all own the beach and we shouldn't  
pay!

From Connor

Dear costly Commission

A I'm 1/4  
Solomon Creek <sup>get the subject at</sup> school. I hope you  
get this letter I want you to  
that it time that beach  
have ~~to~~ be free. If you  
can help that would be  
great!

Sincerely,

Andrea Z...

Dear Coastal Commission, I disagree  
that you should not  
make us pay, because the  
beaches should be free, also.

It used to be ours and  
people that are poor and like  
to go to the beach can't  
last I think there are other  
ways to make money,

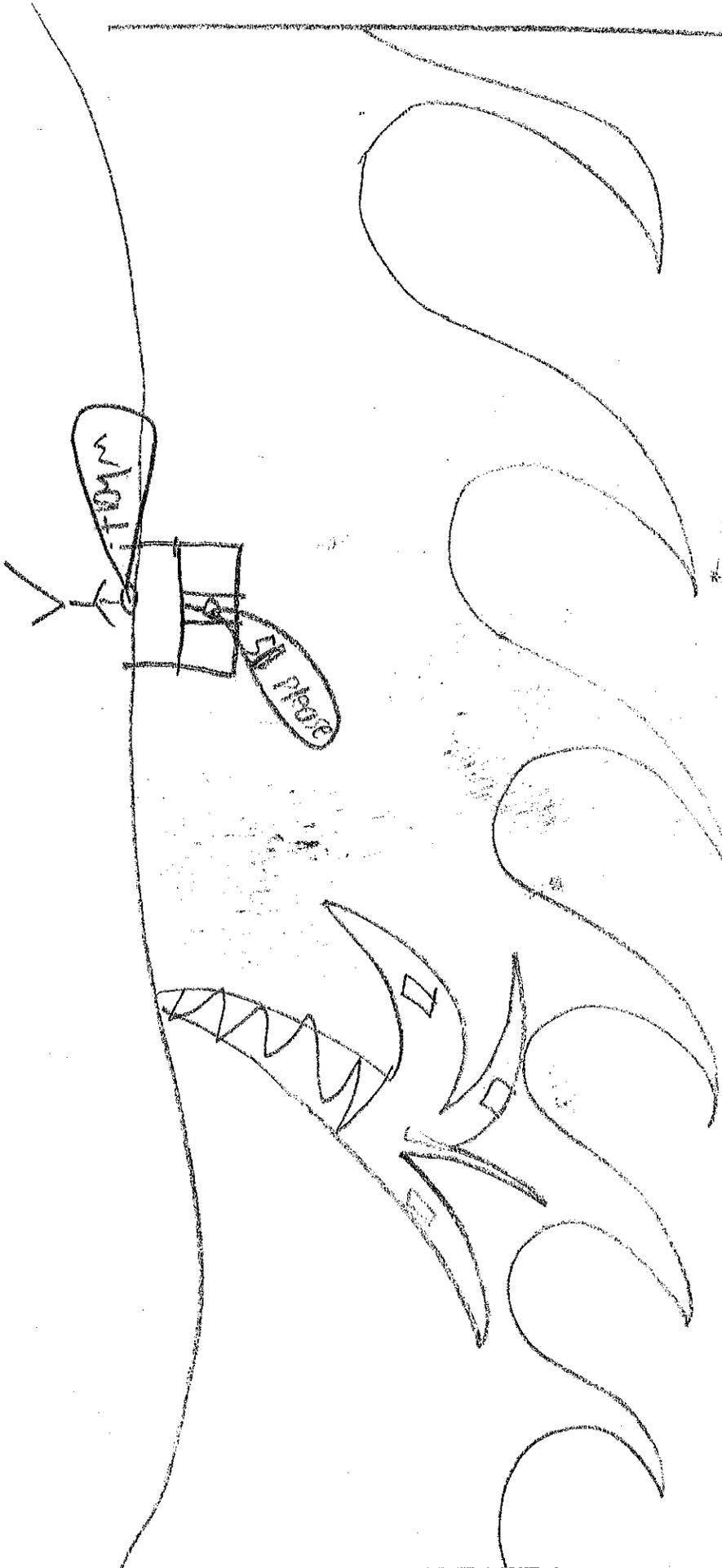
sincerely,  
Kadyn Martin

Dear coastal commission I am a 4th grader  
at salmon creek school, can you guys original ~~let~~  
~~us pay at the beach~~ let people go to the beach because  
it is not far for another to pay ~~to~~

Dear Coastal Comishiner,  
I disagree that you should  
but make us pay because  
that was our beach once,  
and people with less money  
wont be able to to the beach.  
Also, I think there is other  
ways to raise money.

Sincerely

Cambren Nevill

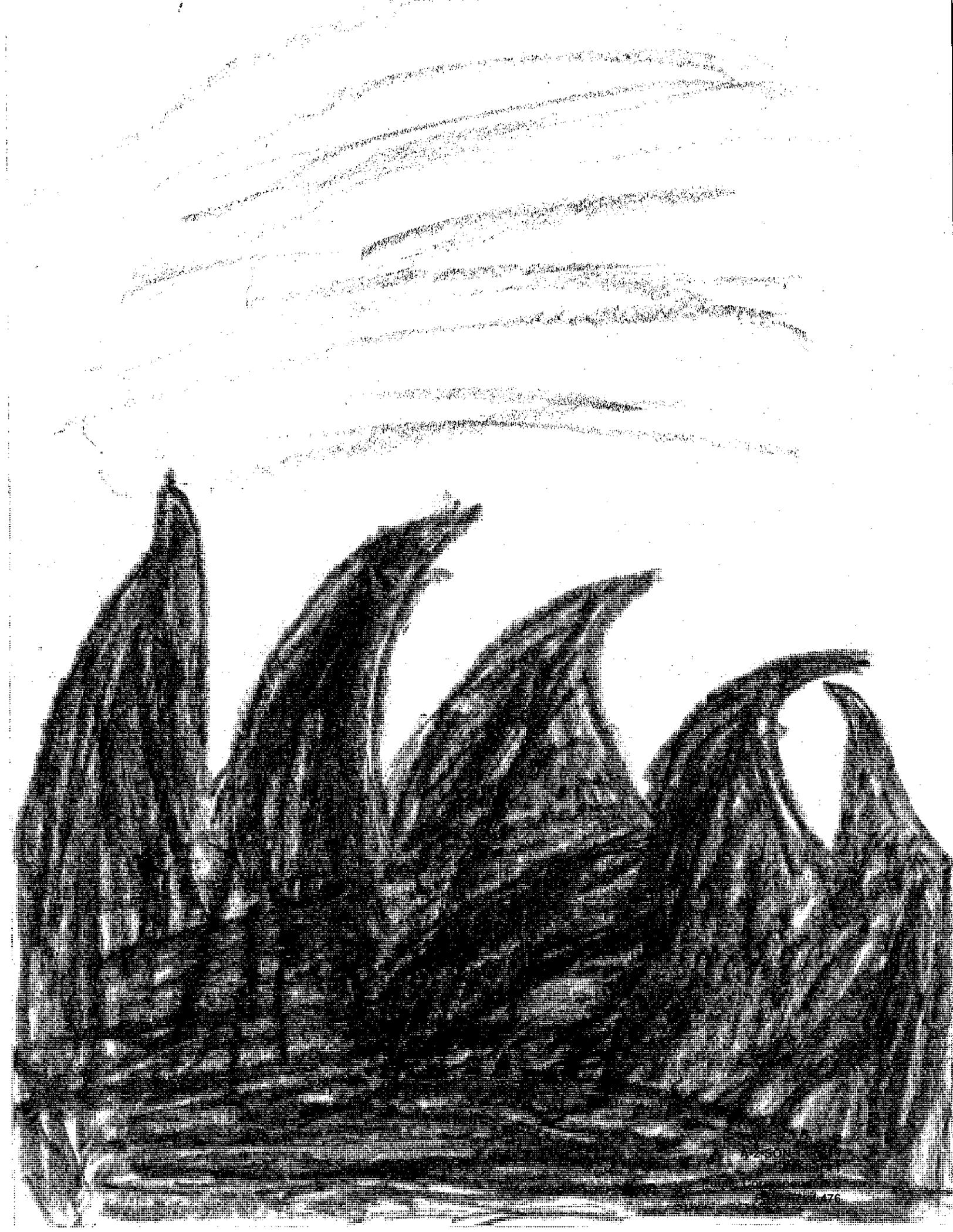


Dear Coastal Commission,

I'm a 4th grade kid at Salmon Creek School. I disagree with charging people money to go to the beach. My reasons are, people might not have the money to pay. Next, there is other way to make money like games sales. One more reason is that people don't want to pay. Don't charge people.

Love,

Regina



Dear Coastal Commission

I am with Garadno at  
Salmon Creek school. We sold  
not pay for are money, you sold  
make are taxes pay.

Sincerely  
Watt



Roman Gray  
Dear Coastal Commission,

~~3-14-16~~  
3-14-16

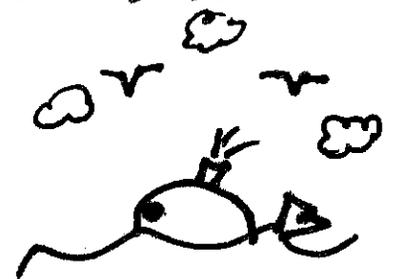
I am a 5<sup>th</sup> grade student  
at Salmon Creek elementary School.  
I think it is **WRONG!** for  
making us **PAY!** \$\$\$  
dollars to just **go** to a  
beach. !!  
~



Dear Coastal Commission, 3/14/16

This letter is coming from a 5<sup>th</sup> grader from Salmon Creek School. I really disagree with the proposal to charge people to just go to the beach to have fun. First, what if a family wanted to go to the beach but, had No money, what would you do? Also what if a child was by himself wanted, to go to the beach and wanted to study for his grade, what would you do? Say no go or say yes come in? Please take this in consideration!

- Hollie ☺



3/14/10

Dear Coastal Commission,

This letter is coming from a 5th grader from Salmon Creek School. I really

disagree with the proposal to change people to just go to the beach to

have fun. First, what if a family wanted

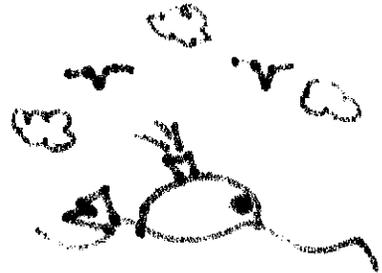
to go to the beach but had no money

what would you do? Also what if a child was hurt

and wanted to start for his grandparents

what would you do? No do or not do?

Please take this in consideration!



- Hollis

Victor

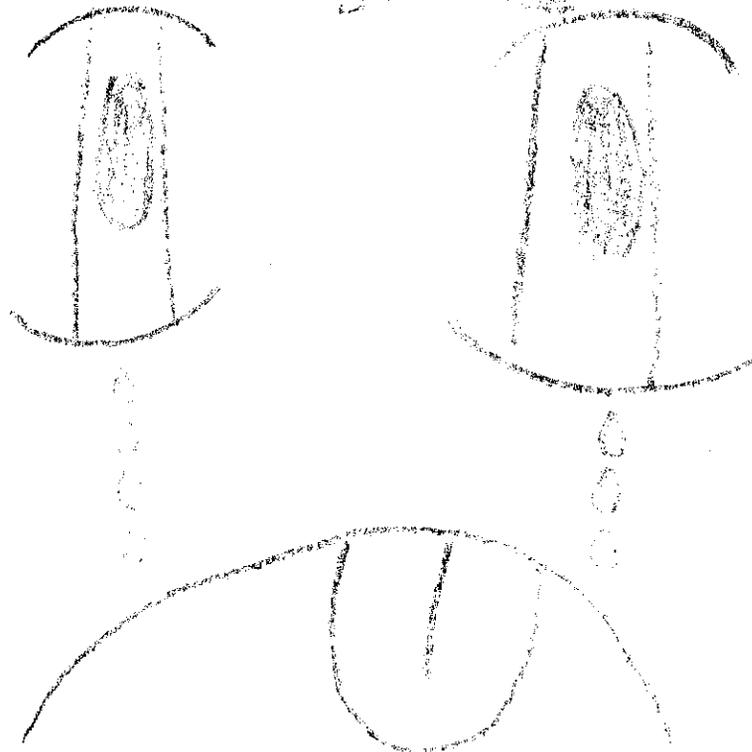
Dear Coastal Commission,

I am a 5<sup>th</sup> Grader a salmon creek school 1 quarter mil from  
Ossipee.

I agree and do not agree with the costs  
that your making and I hop you  
make the right costs

Dear Coastal Commission

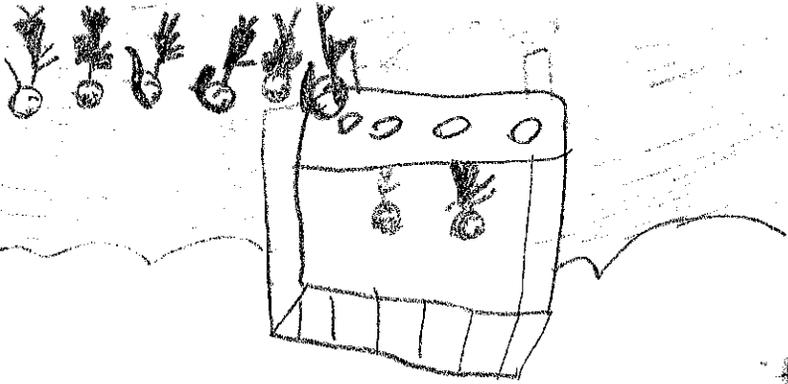
I am a 8<sup>th</sup> grade at Salmon Creek School  
and I believe if U can't park on the beach  
then we are not going to be able to pay to go to  
the beach. Also random people like me made the  
beaches and U are now trying to make us pay to  
enjoy it.  
Dante



5<sup>th</sup> Grade  
Student

At  
Salmon  
Creek  
School

Dear,  
Coastal  
Commission  
or  
Jerry  
Brown



about what's happening here.  
but I have a big heart  
you may not know me  
well now they can't do that.  
and what some people at the beach  
great idea. What if someone's poor  
pay to go to the beach is a  
I don't think that making people  
can still pay you and  
a snack shack people  
down right know and make  
I feel you should shut that

can still pay you and  
a snack shack people  
down right know and make  
I feel you should shut that  
can still pay you and  
a snack shack people  
down right know and make  
I feel you should shut that  
can still pay you and  
a snack shack people  
down right know and make  
I feel you should shut that

Ann Hamilton  
Im Madison

H's

RECEIVED

MAR 29 2016

CALIFORNIA  
COASTAL COMMISSION

Alden John Olmsted  
Filmmaker/ Photographer/ Activist

P.O. Box 1142  
Santa Rosa, CA 95402  
707.799.7663  
alden.olmsted@gmail.com

March 25, 2016

California Coastal Commission  
Attn: Nancy Cave  
45 Fremont Street #2000  
San Francisco, CA 94105

Dear Nancy,

I am writing you today to vigorously oppose the planned beach fees along the Sonoma County Coast. California State Parks has not released the cost of installation of the kiosks or the pay station technology, and has inflated the revenue to be collected.

My father, John Olmsted, who was the first botanist at Golden Gate Park, built two of our CA state parks - Jug Handle Natural Reserve in Mendocino, and the wheelchair accessible Independence Trail in Nevada City. While my dad was doing this my mom raised us on a single parent salary in Sonoma, but she never let us feel underprivileged - she worked hard to provide and to show us California - including our beautiful coast. My mom would not be able to afford \$8 per visit or \$195 per year, and free days do not always work for working parents. Access to our coast is legislated to us all, and there are many other sources to raise the \$1.5 million suggested by these fees.

Places like Central Park (designed by my cousin Frederick Law Olmsted), Griffith Park in Los Angeles - the largest urban park in the U.S., Golden Gate park, and many others, allow people of all ages and income levels to enjoy and receive the qualities that time in nature provides. Please do the right thing for Sonoma County residents and coastal visitors from around the world and keep our beaches free.

In 2011 I raised money to assure that 11 of the 70 intended state parks to close would in fact remain open. I did this \$1 at a time and sent a message to state parks that we deserve responsible management of our parks, which includes creative strategies to raise funds. There's nothing new or creative about a blatant money grab.

Sincerely yours,



Alden J. Olmsted



540 Pacific Avenue, Santa Rosa, CA 95404  
scca@ConservationAction.org

Phone: (707) 571-8566 · Fax: (707) 571-1678  
www.ConservationAction.org

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Steve Kinsey, Chair  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

March 26, 2016

Re: Proposed Sonoma County Beach Fees

Dear Chairman Kinsey and Commissioners:

Sonoma County Conservation Action (SCCA) is a 501c (4) organization whose mission is to protect and enhance the resources of Sonoma County. We were founded by former Sonoma County Supervisor Bill Kortum who died last year. Bill played a leading role in the fight for coastal access first in Sonoma County, then throughout the state with the passage of Proposition 20 and the Coastal Act. Bill was instrumental in the acquisition of Salt Point State Park, whose Stump Beach is now being targeted for fees. The Kortum Trail, named in his honor, runs parallel to the oceans in Sonoma Coast State Park. Its north and south trailheads ironically are among the areas proposed for new fees. Sonoma County's policy to stringently enforce coastal access is no accident, it took years of struggle and the commitment of thousands of individuals and great leaders like Bill Kortum.

SCCA strongly supports the principle of "maximum public access," which is embedded in both the California Constitution and the Coastal Act. The County of Sonoma's Local Coastal Plan (LCP) was written with this in mind, and its Local Access and Recreation Plan, relies on no fees for several of the beaches under consideration to meet this goal. It is very disturbing that the Department of Parks and Recreation (DPR) is attempting to sidestep the Coastal Commission approved LCP, and that DPR's rationale is not supported by the Coastal Act. DPR objective is to "increase revenues." Yet DPR's need for revenue generation **is not a legally recognized factor to limit maximum public access**, according to Sections 30210 and 30214 of the Coastal Act. (DPR claims these funds will go to maintain local state beaches and protect resources, but according to the state's revenue generation "rebate" formula, if DPR does not meet its local revenue target, no funds would come back to the local parks, and at best, after taking out funds going directly to DPR, only a small portion of the fees collected would be returned to the local state beaches.)

It should be noted that the project originally denied by Sonoma County is not the project being brought before the Commission for approval. DPR modified the project when it brought it to the Commission for Substantial Issue determination in April 2015, changed it again when it presented it to the public in January 2016 (at a meeting where no public comment was taken), and revised it for a third time in its March 2016 report to the Commission. Fee areas have changed through deletions and additions; they never before discussed shoulder parking at Bodega Head; automated fee devices have replaced iron rangers and manned fee collection stations; and hourly and demand pricing has been in-



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scca@ConservationAction.org

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www.ConservationAction.org

roduced. How can the Commission consider an appeal of a project that is not the project denied by the County of Sonoma? The proper course would be to either reject this appeal or send this significantly changed project back to the County of Sonoma for a new LCP consistency review.

Price alone will dissuade many individuals and families from accessing our beaches. DPR itself estimates that there would immediately be a 25 percent drop off on use of the new pay lots. Yet DPR claims that there are enough free spaces remaining to meet access requirements – and then they seek to reduce the number of those spaces in their latest project modification which eliminates free shoulder parking at Bodega Head and Goat Rock.

DPR has stated that the purpose of the latest project modification is to address public safety and resources protection concerns, concerns that would be largely nonexistent without the imposition of new parking fees that will encourage visitors to park outside of established lots. DPR does not quantify how many free spaces will be eliminated but it is clear that public access will be further reduced. Charging for or prohibiting parking at the closer-in shoulder sites will also mean those seeking free parking will have to park further away, decreasing access for families and disabled visitors.

Free roadside spaces do not always provide access, especially for the infirm and disabled. For example the walking distance from the entrance to Goat Rock to the beach is 2 miles (a 4 mile round trip). Parking would be Highway 1, along a dangerous curved section. The walk-in would entail navigating several steep slopes. As noted above, DPR has stated its intention to prohibit parking or charge for parking at currently free spaces close to some of the fee collection areas. What this will do is push visitors seeking free parking even further away from access trails resulting in longer, and in some cases more dangerous walks from cars to the parks. And if accidents at Highway 1 pullouts do occur in the future, it is likely that there will be pressure to create new no parking zones, which would further limit access.

The Department argues that its pass program would ensure that that beaches would remain affordable. DPR does have discounted passes, only \$3.50 for disabled, but it only covers half of the parking fee (as an aside there appears to be no plans to use new revenues to improve disabled access to beaches). The limited Golden Bear Pass is \$20 for seniors, but can't be used from Memorial Day to Labor Day or on holidays; the Golden Bear Pass for economically disadvantaged is \$5.00, but eligibility is limited to those earning a fraction of minimum wage. If you are a former P.O.W., a disabled veteran or a Congressional Medal of Honor winner you may be eligible for a free pass, other veterans need not apply. Apparently DPR assumes that the majority of the working poor can afford to lay down \$195.00 for the State Park premium pass or \$125.00 for its passes that do not cover popular southern California beaches (neither pass provides parking for all of the State Parks). The least expensive pass may be DPR's proposed \$50 regional pass, which hopefully will allow parking at the 3 Sonoma County state beaches - at a price several other states charge for their all state park passes - though DPR has yet to specify what it will cover.

Some supporters of the park fees have alluded that Sonoma County, by retaining a historical tradition and protecting its LCP, is not willing to pay its fair share to keep up our parks. The fact is, that Sonoma County residents have made extraordinary generous contribution to our state park system. The Willow Creek unit acquisition was not possible without the Sonoma County Agricultural and Open Space District's contribution of \$10,225,000 (more than half of the purchase price) and The District's funds come from sales taxes.



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lected in Sonoma County. The District contributed \$350,000 to maintain Willow Creek, while Land Paths, a Sonoma County non-profit, has organized hundreds of volunteers to build trails and protect resources. Stewards of the Coast and Redwoods and the Fort Ross Conservancy have coordinated volunteers and raised funds to keep parks open and maintain and protect parks and offer educational programs at all three state coastal parks.

Other Sonoma County non-profits and hundreds of volunteers have also stepped up in DPR's time of need to keep open the Petaluma Adobe, Jack London State Historical Park and Sugarloaf State Park. And, as DPR has noted in its March report, fees are collected at several state beach sites offering amenities. While Sonoma County residents are asking to keep our beaches free, they are not asking for something for nothing.

Meanwhile DPR is locking up Stump Beach, one of the more isolated beaches on the Sonoma Coast which provides needed recreation space for a small coast and ridge community, to collect **a projected annual revenue of \$3,549**. Given that State Parks has sought and won a Substantial Issue determination from the Commission, this miserly approach, if approved, is likely to be repeated at every isolated gravel lot in the state. Sadly there has been lack of support in Sacramento for restoring greatly reduced General Fund allocations to the State Parks and Recreation Fund (SPRF), while revenue generation and local non-profit support is seen as the panacea for State Parks financial woes. As the Parks Forward Commission recognized, local revenue generation may play a part in bolstering DPR's finances, but to achieve financial stability there needs to be a statewide funding program. Yet after more than a decade of State Park's financial crisis, the administration and the legislature has not undertaken even a study of statewide programs that have served other states well, including low cost universal pass programs, small add-ons to licenses or vehicle registrations, allocations of hotel and gas tax revenues (a portion of gas tax revenues are already allotted to state off road vehicle parks, which are awash with funding) and establishment of resort amenities where appropriate. Instead, the Commission is being asked to interject itself into an approved Local Coastal Plan because of DPR's lack of funding and policy options.

The California Coastal Commission has the responsibility of guaranteeing maximum public access to our coast. It is a terrible affront to the residents of the state who have fought so hard for the right of coastal access when private interests attempt to lock up the coast; it is even more intolerable when the government erects barriers to the public commons, our state beaches and evades the Coastal Act to do so. We urge the Commission to reject DPR's application.

Sincerely,

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

Dennis Rosatti  
Executive Director

cc: CA Coastal Commission Members  
State Senator Mike McGuire  
Assemblyman Marc Levine

Governor Jerry Brown  
Assemblyman Jim Wood

RECEIVED

MAR 25 2016

CALIFORNIA  
COASTAL COMMISSION

John and Joy Trimboli  
22885 Conifer dr  
Monte Rio, CA 95462

Dear Nancy Cave:

Our letter is regarding the proposed state parks fees for the Sonoma County area, in particular those at the coast and surrounding hills. People from all over the state and country flock to our area to enjoy nature at our coastline. If some places charge and some are free, naturally the free spots will fill up first and then people will be parking all along the highway. It will no longer be a scenic highway. Pedestrians will be walking along the narrow curvey highway to find access and cyclists will be going around the cars parked on the almost non-existent shoulder. It is just a nightmare waiting to happen.

I was under the impression that parks were made so that everyone could enjoy open space, and the wildness of nature. Parks should be the guardian of this resource not the gatekeeper! The fees would not necessarily even go to maintain THESE parks and the way they intend to spend the money needs some serious oversight! Do we really need to have LANDSCAPED entries to wild space?

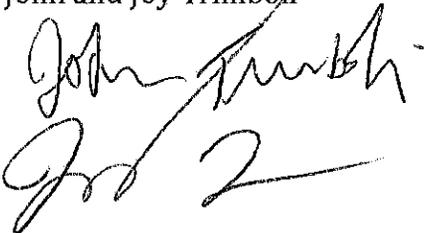
Yearly passes are not always in the budget of struggling families and seniors who sometimes cannot even afford their medications much less a yearly pass to the beach! Sometimes a chunk of \$60-100 is impossible to come by.

The fees cannot even be counted on as it can fluctuate with weather, the price of fuel and other factors.

A MUCH better solution is to delegate a higher % from the state budget to cover the cost of a rising population and higher state park usage. Fostering family values helps with crime rates, success in schools which also helps with crime rates. Please speak for us in recommending they find another way to pay for parks than to make it harder for those who need it the most to have access.

Thank you very much for your hard work.

Sincerely,  
John and Joy Trimboli

Handwritten signatures of John and Joy Trimboli. The signature for John is written above the signature for Joy, which includes the number '2'.

**Tom Roth, 22475 Fort Ross Road, Cazadero, CA 95421**

March 24, 2016

Ms. Nancy Cave, Dan Ainsworth and Jack Carl  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

Dear Ms. Cave, Mr. Ainsworth and Mr. Carl:

Thank you for the opportunity to comment on State Parks latest proposal for fee collection at several sites within the Coastal Zone in Sonoma County. I sincerely hope that my comments aid the Commission at coming to a fair and justifiable resolution to the issues before them. My comments are as follows:

**Willow Creek should not be included in the appeal.** The belated Inclusion of the Willow Creek unit in State Parks' appeal of Sonoma County's LCP consistency determination should not be considered by the Commission. The Department of Parks and Recreation (DPR) has not brought the project to Sonoma County for an LCP determination, so how can it be the subject of an appeal? Further, the Willow Creek unit is 3,347 acres, dwarfing all the other park units under appeal. Considering its size alone and the unknown impacts of opening it to a paying public, it should be analyzed through an Environmental Impact Report.

**Keeping beaches free does not mean a free ride for Sonoma County.** It should be noted that Willow Creek is a prime example of Sonoma County residents' extraordinary generous contribution to our state park system. More than half the purchase price of Willow Creek, the amount of \$10,225,000 was allocated by the Sonoma County Agricultural and Open Space District and \$350,000 was given by the District to manage the park. Those monies represent sales taxes collected in the county that support the District. Additionally, Land Paths, a Sonoma County non-profit, has made improvements to the park by organizing hundreds of volunteers. Similarly, volunteers have been utilized by Stewards of the Coast and Redwoods and the Fort Ross Conservancy to maintain, protect and offer educational programs at the Sonoma Coast State Beaches, Fort Ross Historical Park and Salt Point State Park. Both Stewards and the Conservancy have raised funds to provide services and programs at these coastal parks. Other Sonoma County non-profits and hundreds of volunteers have also stepped up in DPR's time of need to keep the Petaluma Adobe, Jack London State Historical Park and Sugarloaf State Park open. While Sonoma County residents are asking to keep our beaches free, they are not asking for something for nothing.

**Public Process has been undermined.** The last minute major revision of the project, continues SDPR's moving target strategy. The project originally brought to the Commission was not the same project brought to Sonoma County, and the project in DPR's appeal differs significantly from the project originally brought to the Commission. Add to this DPR's unwillingness to

accept public testimony at a meeting mandated by the Commission and DPR's unwillingness to do a full EIR on a project with statewide significance and you have a broken public process. The project has ramifications for public access at State Park gravel lots up and down the state. Additionally, the project deserves an EIR since it is only appealable to the Commission because "it constitutes a major public works project pursuant to the definitions under Coastal Act Section 30114(c) and CCR Section 13012(b)," according to the April 3 Commission staff report.

The fact that a DPR-selected group of stakeholders publically disavowed DPR's new project underlines the lack of public confidence in State Parks project and process.

**When car transportation is curtailed, beach access is reduced.** The the rural Sonoma Coast does not have adequate public transit. Buses to Goat Rock are limited to a few each weekend, and there is no other bus service except for a once a day Santa Rosa to Fort Bragg bus north of Jenner(which does not stop at state parks or beaches). The Commission's March 3, 2015 staff report states that the project before the Commission then would result in an overall 135% increase of paid parking spaces on the Sonoma Coast and a corresponding 45% decrease in parking spaces. Under the new proposal, it appears that the Pomo Canyon Parking lot which was originally listed as a free lot would be a paid lot within the Willow Creek unit. DPR has not released revised parking space figures based on the latest revised project, so it is impossible to determine the new percentages.

**Keeping some roadside parking spaces free does not equal maximum public access.**

Distance, dangerous highway conditions and frequently steep beach access trails all will dissuade the elderly, infirm and disabled and families with children from using the roadside spaces. For example the walking distance from the entrance to Goat Rock to the beach is 1.7 miles (a 3.4 mile round trip). Parking would be Highway 1, along a dangerous curved section. The walk-in would entail navigating several steep slopes. At Stump Beach, there is limited parking across Highway 1, a section often frequented by logging trucks with little speed enforcement. The next nearest parking is .5 miles away, along a windy, tree shadowed Highway 1. If accidents at Highway 1 pullouts do occur in the future, it is likely that there will be pressure to create new no parking zones, which would further limit access.

**Sonoma County has asserted that DPR's need for revenue generation is not a legally recognized factor in Sections 30210 and 30214 of the Coastal Act to limit maximum access.**

DPR only response to this is to belatedly list other factors, such as resource protection and public safety, for their reasons to charge fees. However, to my knowledge, DPR has not backed up their new list of criteria with any evidence that it applies to the project sites. It should be noted that there has been little response from DPR on a host of issues raised by both the County of Sonoma and the Commission.

Finally, while supporters of free beaches are sympathetic with DPR's financial predicament – the lack of support in Sacramento for restoring fallen General Fund allocations to the State Parks and Recreation Fund (SPRF). It is unfortunate that revenue generation that is, parks generated support, is seen by key policy makers as the solution to State Parks financial instability. Although the Parks Forward Commission has recommended that a new statewide source of

financial support be established, it has been met with official silence. The state has not even undertaken a study of fee and tax supported free entrance policies in a number of other states. Governor Brown did parks a good turn with a budget calling for a transfer of funding to State Parks from gas taxes targeted to off-road vehicle parks which are awash with funds, but more needs to be done in this area. DPR' premium park pass, which in several other states provides significant revenues for state parks, can never reach its potential when its \$175.00 price remains the highest in the nation, and it excludes some of the most popular parks. Sadly, it appears that the Commission is being asked to interject itself into a Local Coastal Plan because of DPR's lack of funding policy options.

As a supporter of both our State Parks and the important work of the Coastal Commission, I look forward to a robust discussion of these and other issues pertinent to DPR's fee proposal at the upcoming hearing in Santa Rosa. Thank you for your interest and thoroughness.

Sincerely,

Tom Roth

Nancy Cave  
California Coastal Commission  
45 Fremont St, Suite 2000  
San Francisco, CA 94105

March 22, 2016

Dear Ms Cave:

I vehemently oppose the proposal to charge fees to access the beaches in Northern California. The state Parks should be adequately funded through the legislature. If this is not happening, we need to change the system so that it does happen. The beaches should be free to all who want to come there; the beaches should not be available only to those with money. The beaches are a national resource and should be open to all.

Please work to deny the state Parks' request to put fee-collection devices at Bodega Head and the other N. Calif. beaches.

Thank you —

Sincerely,

Margaret Rose Rives  
MARGARET ROSE RIVES  
7777 Bodega Ave - 5213  
Sebastopol, CA 95472



*The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. The Surfrider Foundation now maintains over 90 chapters and 250,000 members, supporters, and activists in the U.S.*

March 22, 2016

Attention: Nancy Cave, District Manager  
North Central Coastal District  
California Coastal Commission  
Re: A-2-SON-13-0219  
California State Parks' Proposed Fee Collection on the Sonoma Coast

The Sonoma Coast Chapter of the Surfrider Foundation recommends denial of the State Park's proposal to implement fees at Bodega Head, Shell Beach, Goat Rock State Beach, & Stump Beach parking area at Salt Point State Beach Park. Surfrider has enjoyed a longstanding cooperative relationship with Department of Parks & Recreation; however our organization's mission to preserve coastal access and resources prevents us from supporting this proposal because the submitted proposal:

- Proposal provides inadequate information of the specifics of the project or any analysis of the impacts and fails to meet both CEQA and Coastal Act requirements,
- Is a violation of public access provisions of the Coastal Act,
- Contains numerous inconsistencies and unsubstantiated data to support DRP's claims, and
- Is the result of a flawed public process

**Inadequate CEQA analysis:** While we recognize that the Coastal Commission's staff report is used as the equivalent to CEQA, the fact that the required information and analysis necessary for complete

disclosure is not available to the commission's staff requires that this project be denied. The 2012 exemption for the original proposal submitted to Sonoma County PRMD which is now being re-utilized by DPR to satisfy CEQA guidelines in this current proposal did not account for the grading or paving necessary to reach ADA compliance, did not account for the change in intensity or density of use that would result from imposition of fees, did not identify natural resources to be managed or protected in the fee areas, and did not identify impacts to natural resources as a result of new fees.

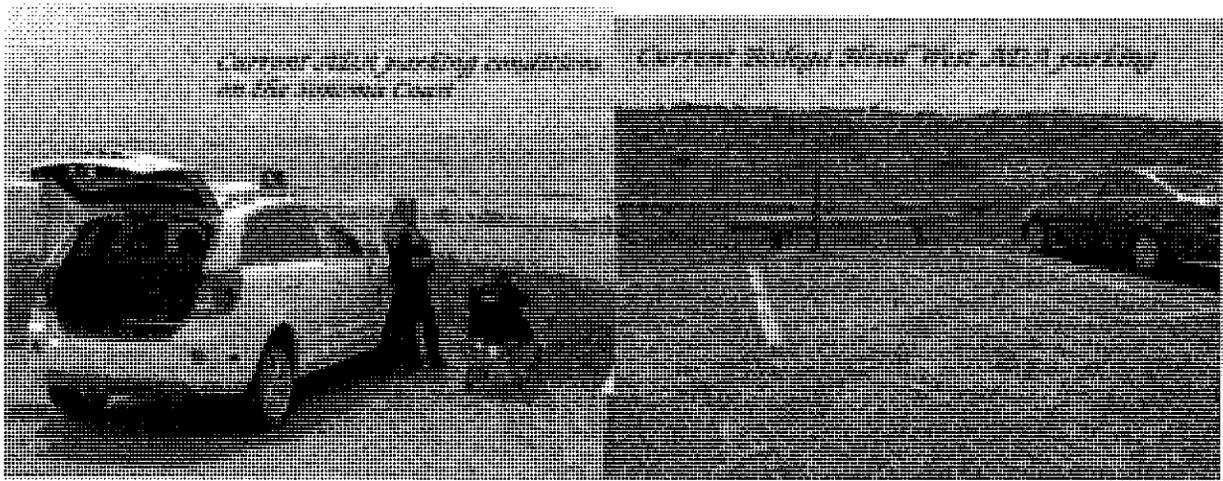
Therefore, if the original CEQA exemption was determined to be inadequate to meet the actual scope of the original proposed project, there is no possibility that it could be adequate for the current proposal which now includes ADA compliance and claims of the necessity of fees to manage resources.

The original Notice of Exemption described the nature and purpose of the project as:

*"...installing 14 self-pay stations and fee signage within Salt Point and Sonoma Coast State Parks. Installation consists of; excavation of holes (maximum 3' depth X 2' width), iron rangers set in concrete and sign posts in crushed rock and backfilled with native soil."*

This description does not include the scope of development involved in grading/paving for ADA compliant parking and pathways or the impacts associated with this level of development which should be analyzed as part of CEQA review. The project description in this revised proposal now includes a provision that includes ADA accessible parking and routes between the accessible parking spaces and fee collection stations. §3.1 of the current proposal under Project Description now acknowledges the physical design features required for *"Construction of the appropriate number of accessible parking spaces commensurate with parking lot capacity"* & *"Construction of ADA compliant concrete paths to connect accessible parking with fee stations."* §5.3. **ADA Accessibility provides:** *"Each project undertaken by State Parks must be designed and implemented to comply with the Americans with Disabilities Act."*

However, there is no analysis of the level of grading or paving required and the impacts to coastal resources from the grading. Without such information the impacts to coastal resources cannot be determined. In addition, the current State Park Site plans do not fully meet ADA compliance requirements. DPR currently fails to provide individuals with disabilities adequate access to the Sonoma Coast.



(See attached State Parks Site Plan analysis with noted deficiencies and comments regarding ADA compliance requirements).

Therefore, a complete analysis of the impacts of grading and paving to achieve ADA compliance must be conducted as part of the project's analysis prior to approval of a permit.

Natural Resources:

The original justifications for an exemption were listed as:

*“project consists of construction and location of limited numbers of new, small facilities, minor public alterations.....and construction or placement or minor structures accessory to (and appurtenant to) existing facilities included as “installation of signs” and “installation of fee collection devices”*

The current proposal in § 1.0 states that *“The proposed project would provide State Parks the ability to more effectively manage vehicular parking during peak use periods on up to 8 existing day use parking areas in Sonoma Coast State Park and Salt Point State Park, as necessary to better accommodate use and prevent deterioration of natural resources”* however there is no analysis of what natural resources are in a given area, where these unidentified resources are located in relation to parking areas, what impacts public use has on those unspecified resources, or how limiting access will protect the unspecified resources.

Therefore, an analysis that comprehensively identifies natural resources to be protected must be conducted as part of any submittal to the Coastal Commission and completed prior to approval of the States Parks proposal. Without such information a determination of the justification under the Coastal Act for imposition of fees based on the necessity to protect natural resources is not possible.

**Public Access & Coastal Act Compliance:**

The Sonoma Coast is a “car dependent for access” coastline. There exists no viable public transportation, no urban areas adjacent to coastal access, and no safe means of access by biking or walking. In order to visit the Sonoma Coast beaches, one has to drive and park. Charging for parking is charging to access the coast.

The Coastal Act provides:

•**Section 30210:** Access: In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted and recreational opportunities, shall be provided for all the people...

•**Section 30213:** Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided.

Revenue generation is not legally recognized as a factor in the Coastal Act to limit public access and the imposition of parking fees for the purposes of revenue generation is insufficient justification on its own to limit maximum access opportunities to the coast. DPR claims under §2.5 that newly implemented fees would enhance public access by providing better services and amenities.

As reported in the Commission’s “**Appeal Staff Report; Substantial Issue Determination**” dated April 3, 2015: “...it is not so clearly demonstrated that fees collected under State Parks’ proposed Sonoma Coast project would result in proportionate increases in services that would enhance public access at the very same State Park units on the Sonoma Coast” unless “Parks can demonstrate that there is direct connection between the fees proposed through the denied project and resultant actions/improvements at Sonoma County coastal State Parks units” (page 15)

DPR has failed to show this connection in the current proposal or how they will meet target revenue goals that would result in funds generated from fees actually being utilized in the areas where fees will be implemented. **Public Resource Code 5010.7** requires that funds must be used towards further “fee generating” projects rather than applied to deferred maintenance or enhancing services throughout the Park including those not generating income. In fact, under §2.5 DRP states that “fees collected at state park units are deposition in the State Parks and Recreation fund which is **available upon appropriation by the legislature**”. There is no guarantee that this will occur nor any guarantee, if appropriated, will be spent at the locations generating the income.

Additionally, the current proposal advocates that fees will be used to limit public access as a means to protect coastal resources. In § 4.3 **Consistency with the California Coastal Act**, DPR states that the revised plan will “*maintain maximum public access*”. How can limiting the number of parking spaces and eliminating free ones maintain public access when this stretch of coast can only be reached by the use of private cars? This statement is also inconsistent with the stated goal of the project to reduce impacts on ESHA by reducing over-all public access and use.

**§5.1 ESHA:** Fees will be utilized “as a tool to achieve that balance. If overuse results in resource degradation, the plan calls for implementation of measures including: facility design; installation of barriers; surface treatments; area or facility closure; change in access locations, or redirection of visitors to other areas. Other methods include regulations including limiting the number of people, location or time of use.” DPR fails to explain any of the specifics of the implementation measures or how they would reduce resource degradation rather than expand it by creating new, uncontrolled parking areas. The only method appears to be reduction in usages, which is totally inconsistent with both the Coastal Act and DPR's own statement in § 5.5 where they specifically state that after an initial decrease in attendance the attendance will “rebound”. If the primary means to reduce resource degradation is by reducing public use and such use “rebounds” then there will be no benefit to the resources. In fact, by creating new areas which the public will use when their current free parking areas are closed to them, the net impact to coastal resources will be a negative one. DPR's suggestion that those parking along several of the unpaved areas will be subject to payment of fess is without any clue as to how that would be achieved

Therefore, it is difficult to reconcile DPR's conflicting claims that fees enhance public access while at the same time limiting public access.

#### Disproportionate Impact to Youth, Elderly, and Low Income

The current proposal states under § 1.5 **Economic Impact** that “*Household incomes for visitors are relatively high with 57% earning over \$75,000 annually and only 15% earning less than \$40,000.*”

However there is no citation that verifies the source of these statistics nor any indication if it includes the household incomes for the visitors from the San Joaquin and Sacramento Valleys which it states under §1.5 make up the majority of users. Sonoma Coast Surfrider also challenges this assertion by DPR as it is inconsistent with our observations as well as data available on demographics of visitors to the coast.

According to Measure of America “A Portrait of Sonoma County”

(<http://www.measureofamerica.org/sonoma/>), the 2014 median earnings, the main gauge of material living standards in this report, are \$30,214 annually in Sonoma County which is on par with earnings in California which is significantly lower than what DPR reports.

A significant portion of users to the coast are minorities, low income, youth, and the elderly and not the affluent as portrayed in DPR statistics and consist of both a local population as well as inland visitors.

State Parks responds to concerns about disproportionate impacts to these communities with the offer of special passes to offset these impacts. The current special & discounted passes available are inadequate in offsetting the impacts to the groups they purportedly serve.

For example:

1. "GOLDEN POPPY VEHICLE DAY USE ANNUAL PASS – the lowest price pass available costs \$125.00 yet is not valid at the high demand Southern California Beach Parks and admittance and use with the pass is still subject to available space.
2. DISABLED DISCOUNT PASS –costs \$3.50; however, this pass only entitles the bearer to a 50% discount for vehicle day use. Those with physical disabilities will require a path of travel from an ADA compliant parking space to the APM fee collection machine and still need to afford ½ the fee.
3. DISTINGUISHED VETERAN PASS - No Fee (Lifetime Pass) only applies to “honorably discharged” veterans and excludes veterans who are “generally discharged under honorable conditions”.
4. LIMITED USE GOLDEN BEAR PASS –costs \$20.00 for seniors (persons 62 years of age or older) but only works during Non-Peak Season so **can't be used during summer or holidays.**
5. GOLDEN BEAR PASS – costs \$5.00 for any qualifying person. To qualify a single person must be making less than \$11,328 or \$21,012 for married persons and must submit a tax return and get a sign off from their caseworker if receiving SSI. These rates are less than minimum wage and anyone earning more than this is not eligible for the discounted pass.

According to realistic incomes levels of Sonoma Coast State beach users and visitors there is a significant portion of the population that falls between qualifying for these special passes and those having enough disposable income to pay fees to access the coast. The GOLDEN BEAR PASS does not provide any help for those who need it the most and the application process is difficult and degrading. The annual income level cap means that only those who cannot afford a car might be able to get it. Those who are working at minimum wage and need it the most do not qualify. Even when qualifying, public access is limited by the conditions of the passes themselves and the proposal's aims to limit access even for pass holders. Also DPR's website to apply for special passes, even though available in other languages, does not have applications available for the special passes in any other language but English.

Negative Precedent:

The Commission determined that the justification for finding substantial issue to remove jurisdiction from Sonoma County in April 2015 was because the fee proposal had STATEWIDE implication and that *“these types of statewide issues warrant the Commissions involvement”*. Utilizing this basis for their decision means that the current proposal and result in Sonoma County has the potential to set statewide precedent which will be followed along the entire coast of California. Approval of fees in Sonoma County paves the way to implement fees at unpaved parking areas with minimal amenities through-out the California coastline currently free and providing alternative access to the coast for those that cannot afford to pay for higher developed coastal access lots. The negative and disproportionate impact to public access which the Coastal Act exists to prevent is at issue with this proposal. DPR has already applied for the right to implement fees at undeveloped parking areas in Mendocino County.

Failure to Comply with the Provisions of the Certified LCP

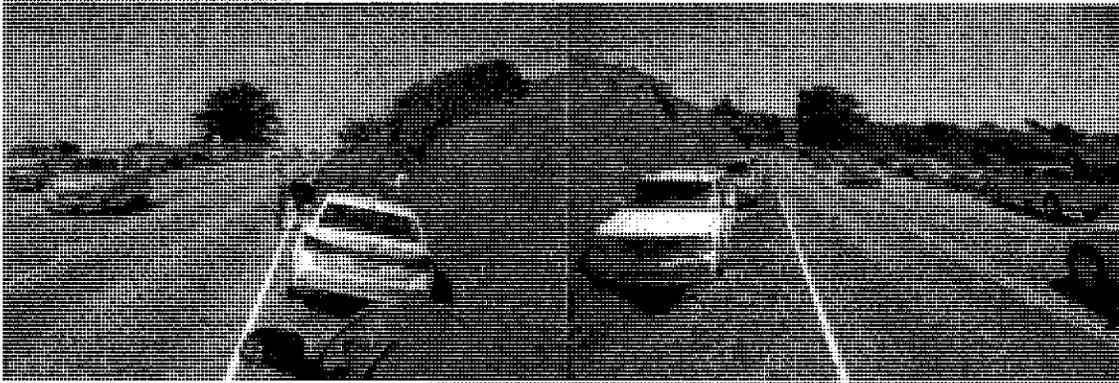
DPR states in §4.2 that the project is consistent with the Sonoma County LCP however, the County in its analysis made it clear that there are numerous provisions of the LCP that the project does not comply with. In particular, DPR states that the LCP merely states "No change" to the current access available and that this does not include the imposition of fees. However, under the Coastal Act any change in the density or intensity of use is considered development. Therefore the project is considered to be development under the Coastal Act and "no change" means no change in development. Any new development is thus inconsistent with the LCP and requires an amendment to the LCP.

**Inconsistencies and Unsubstantiated Data in Proposal of Concern:**

- **§1.4 Visitor Data** states that monitoring of vehicle counts utilizing TRAFx data counters to establish baseline visitation data began in May 2015. Prior to this time DPR has repeatedly stated in public hearings that baseline data did not exist. The proposal; however, includes a chart in **§1.3 Visitation to Sonoma Coast State Park** showing “free day use” statistics for fiscal years beginning 2000/2001 through 2013-2014 without explaining how that data was determined or arrived at. In addition, DPR states that the “method of tracking” does not identify how many vehicles enter versus exit in an hour and only provides the raw data of vehicles triggering a counter.” What they do not acknowledge is how many vehicles are entering and exiting without remaining or actually using the area. The visitation numbers reported are ambiguous and unverified however they are being relied upon to determine revenue goals and justifying reasoning to limit access.

- **§1.4 Visitor Data** states that on certain heavily impacted days at Bodega Head there are more vehicles visiting the Park than parking spaces available. What DPR fails to mention is that they have closed Bodega Head East Lot with 100 parking spaces for over 4 years and therefore channeled all cars to the Bodega West lot. All data gathered for Bodega Head and the impacts of peak use reported are inaccurate as there are no traffic counts for utilization of Bodega Head East Parking lot.
- In **Appendix A "Parking Overview in Sonoma Coast State Park and Salt Point State Park"** DPR indicates 2,414 existing parking stalls. This statistic is being used in **§ 2.1 Existing Conditions** to help support the statement that DPR is challenged to staff and maintain these areas with current revenue generation. We want to point out that 482 "parking stalls" (20%) of the total number are roadside shoulders barely a car width and simply dirt without vegetation. Many of these shoulders are in obscure locations such as "Cemetery" and "Orchard" at Fort Ross State Historic Park and several miles from beach access at the proposed new fee locations. It is a distortion of actual circumstances to imply that they offer viable free parking opportunities for the general populace using Sonoma Coast State Beaches or adding to DPR's hardship of park staffing and maintenance. It should also be noted that DPR recommends installing signage at roadside parking adjunct to fee'd parking lots to inform people there is a fee to park there as well.
- In **Appendix A Parking Overview in Sonoma Coast State Park and Salt Point State Park** DPR depicts a graph which shows that Salt Point lot currently has fees in 82% of developed parking areas, will fee under the proposal an additional 11% when adding the "Stump Beach lot" and leave only 7% of possible access to the coast as free. The inclusion of Stump Beach as a fee location leaving only 7% free access opportunities not only exemplifies DPR's failure to account for public access impacts but also shows that DPR changes the definition of "developed" and "undeveloped" throughout the proposal. DPR classifies Stump Beach lot as "*developed*" although **Appendix F Associated Projects** reveals that the restroom is non-functioning, there is no potable water, and grading/paving would be required for ADA compliance. DPR fails to define the parameters of what constitutes "developed" v. "undeveloped lots" and "amenities provided" is inconsistent and malleable to suit DPR's justifications for implementing fees.
- DPR claims that installation of the fee collection device in certain locations will not induce people to park outside of the day use parking area in areas that have never seen parking, to avoid paying fees because the shoulders on SR 1 in the vicinity have "*dense vegetation, roadside ditches, or other topography that severely limits the ability for creation of shoulder parking.*" Historic practices show otherwise and visitors avoiding fees will continue to seek out dangerous

parking or parking in sensitive habitat to avoid fees resulting in additional resource damage which is not accounted for in any analysis of the net impact of the project.



- **§2.7 “Traffic and Parking Impacts”** DPR recognizes that there *“a few locations where patron may elect to park informally and walk-in rather than pay a day-use fee, creating new parking areas and associated social trails through sensitive habitats”* and cites one of these locations as Shell Beach. Later in the proposal in **§5.1 ESHA** DPR states that at Shell Beach the *“fee collection devices will not induce people to park outside of the day use areas that have never seen parking, to avoid fees”* If DPR is already aware of areas where volunteer trails through sensitive areas exists then rather than utilizing this as a justification that there are “no new” impacts, DPR should be seeking ways to protect these areas rather than increase their usage by adjacent installation of fee collection.
- In **§4.3. CONSISTENCY WITH THE CALIFORNIA COASTAL ACT**, DPR interprets **§30214** to mean that there must be some “limits to free and unrestrained access” and that fees are being implemented in an area where there is “Wholesale free-for-all beach access”. However, **§30210** place only four limitations on the requirement for maximum access and the collection of fees is not one of them. Currently on the Sonoma Coast there is not wholesale free access as DPR charges at Bodega Dunes, Wrights Beach, Reef, Fort Ross, Gerstle Cove, Woodside, and Fisk Mill locations which are staffed parks with camping, programming, and other amenities.
- **Appendix D Response to Comment 5** provides that public access will not be limited because “... fees will only be charged during peak use times.” In other portions of the application DPR does not limit the collection of fees to peak times only. DPR does not explain this anywhere in their application.

Failure to meet Commission's conditions in other areas where fees have been implemented:

In other areas of California where the Commission has approved fee permits, approval was conditioned upon DPR *"monitoring and periodically reviewing the implementation of any new fee program including impacts on coastal access and annually reporting to the commission available and relevant monitoring data and evaluation including but not limited to daily attendance and impacts to public access."* To date, DPR has failed to comply with these reporting requirements and no evaluation has been conducted to show if the higher fees had an impact on coastal access or what groups were most affected. **These studies need to be conducted by Parks and evaluated by the Commission before further fees are approved.**

In the current proposal DPR claims in §4.5. **Consistency with the 2013 Agreement between State Parks and CCC** that *"State Parks has incorporated all the measures recommended therein in this proposed project" and that "to the extent that the approaches are applicable, they have been incorporated into the Revised Fee Proposal."* DPR does not list specifically which measures or approaches have been integrated into the revised proposal. In addition if DPR has not met the conditions imposed in other areas, there is little reason to believe that conditions will be complied with under this current permit if approved and impacts to public access and environmental resources will most likely not be measured or reported.

**Public & Stakeholder Process:**

While appreciating State Parks efforts to gather public and stakeholder input, the process was flawed because:

- Many affected groups whose access rights will be disproportionately impacted by new fees, such as Latinos, Native Americans, and low & limited income communities were not included in the stakeholder process even though representatives were available and expressed their interest in being included.
- Throughout the stakeholder process, there was never attendance by state level DPR staff even though their presence was continually requested by the groups involved. This resulted in uncertainty as to which proposal was being evaluated. This caused an unreasonable delay in the planning and notice of the actual goal of the stakeholder process which was to design and implement a public forum to gather community input on the proposal.
- In §2.7 **Public Outreach Efforts** DPR claims that at the open house on February 17<sup>th</sup> the *"...meeting quickly became contentious and State Parks was never able to fully articulate its vision"* however what they fail to mention is that State Parks' staff were refusing to allow public

comment as promised to stakeholders prior to the forum and expected by the attendees-this is what caused the contention.

- The proposed project is continually changing without the ability of the public to have proper notice or the time required to comment fully on it.

For the above reasons, Sonoma Coast Surfrider is recommending denial of DPR's de Novo Application.

Thank you,

*Cea Higgins*

Sonoma Coast Surfrider  
Policy and Volunteer Coordinator

*Spencer Nilson*

Sonoma Coast Surfrider  
Chair

## **Observations on ADA grading/paving requirements for State Parks fee proposal:**

After review of State Parks proposed parking improvements and the associated construction I have the following observations regarding ADA parking and pathway requirements:

1. Unpaved gravel lots at Bodega Head East and Bodega Head West pose a conundrum for determining the correct number of accessible parking spaces based on the total number of parking spaces provided. The best solution is to use State Parks own parking capacity data for each location. When this is done it indicates that more accessible parking needs to be provided at each location.
  - Bodega Head East: 101 total parking spaces requires 5 accessible spaces including 1 van accessible stall - only 2 accessible spaces are shown on Site Plan Sheet L-1. Estimated grading/paving area for parking spaces, walkways and APPM pad = 1,900 square feet.
  - Bodega Head West: 92 total parking spaces requires 4 accessible spaces including 1 van accessible stall - only 3 accessible spaces are shown on Site plan Sheet L-2. Estimated grading/paving area for parking spaces, walkways and APPM pad = 1,150 square feet.
2. Shell Beach: 38 total parking spaces requires 2 accessible spaces including 1 van accessible stall. Site Plan Sheet L-3 shows the required 2 accessible spaces. Existing paved parking lot gets restriped. Estimated grading/paving area for walkways and APPM pad = 640 square feet.
3. Blind Beach: 18 total parking spaces requires 1 accessible parking space which would be a van accessible stall. Site Plan Sheet L-4 shows 1 accessible space but does not show a necessary walkway in front of parking space and out of drive area. Also, existing paving condition is not barrier-free so accessible parking zone should be repaved. Existing paved parking lot gets restriped. Estimated grading/paving area for parking spaces, walkways and APPM pad = 640 square feet.
4. Goat Rock South: 112 total parking spaces requires 5 accessible spaces including 1 van accessible stall. Site Plan Sheet L-5 shows 5 accessible spaces. Estimated grading/paving area for walkways and APPM pad = 300 square feet.
5. Goat Rock North: 65 total parking spaces requires 3 accessible spaces including 1 van accessible stall. Site Plan Sheet L-6 shows 3 accessible spaces. Existing paved parking lot gets slightly reconfigured and restriped. Estimated grading/paving area for walkways and APPM pad = 240 square feet.
6. Arched Rock View: 26 total parking spaces requires 2 accessible spaces including 1 van accessible stall. Site Plan Sheet L-7 shows 2 accessible spaces. Existing paved parking lot

gets restriped. Estimated grading/paving area for walkways and APPM pad = 240 square feet.

7. Stump Beach: Existing gravel parking lot is not scheduled for paving. If it were paved and striped it could offer between 16 and 20 total parking spaces which would require 1 accessible parking space including 1 van accessible stall. Site Plan Sheet L-8 shows 1 accessible space. Site Plan Sheet L-8 also shows a new single-occupancy restroom building. Estimated grading/paving area for parking spaces, walkways, restroom building and APPM pad = 750 square feet.

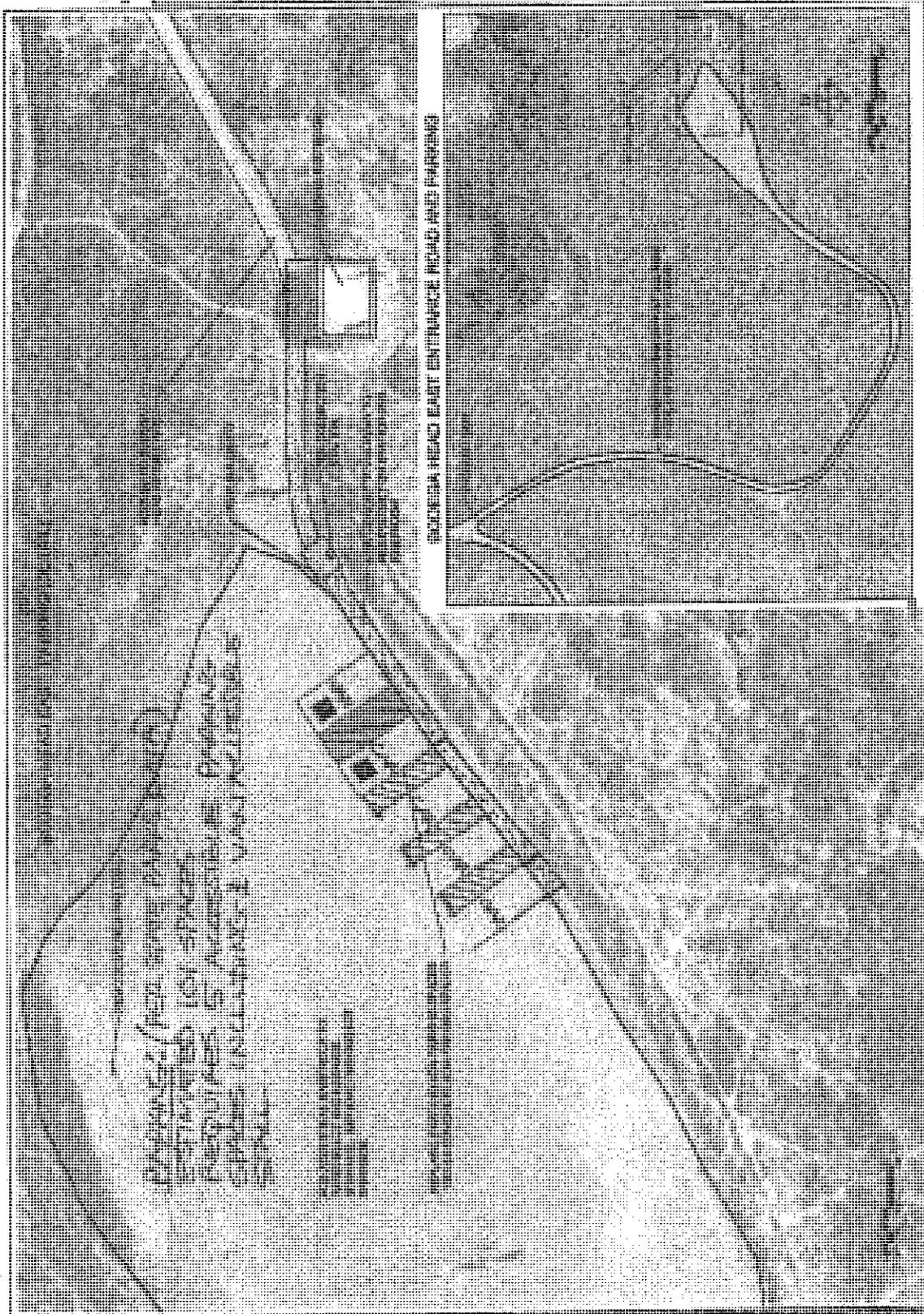
The cumulative grading/paving area for the proposed project is roughly 5,860 square feet. To construct the ADA parking spaces and walkways to the strict tolerances for allowable slopes Civil Engineering Drawings will be necessary. The building permit process should be defined by the Coastal Commission's review of the application in order to have the checks and balances for a Code-complying outcome. California Civil Code Section 55.53 states that a local agency shall employ or retain a building inspector who is a Certified Access Specialist (CASp) to conduct plan permitting and construction inspection for compliance with State construction-related accessibility standards.

*Spencer Nilson,*

Spencer Nilson

AIA (American Institute of Architects), CCS (Certified Construction Specifier)

Sonoma Coast Surfrider Chair



SCIENCE HEAD PARKING (PART)





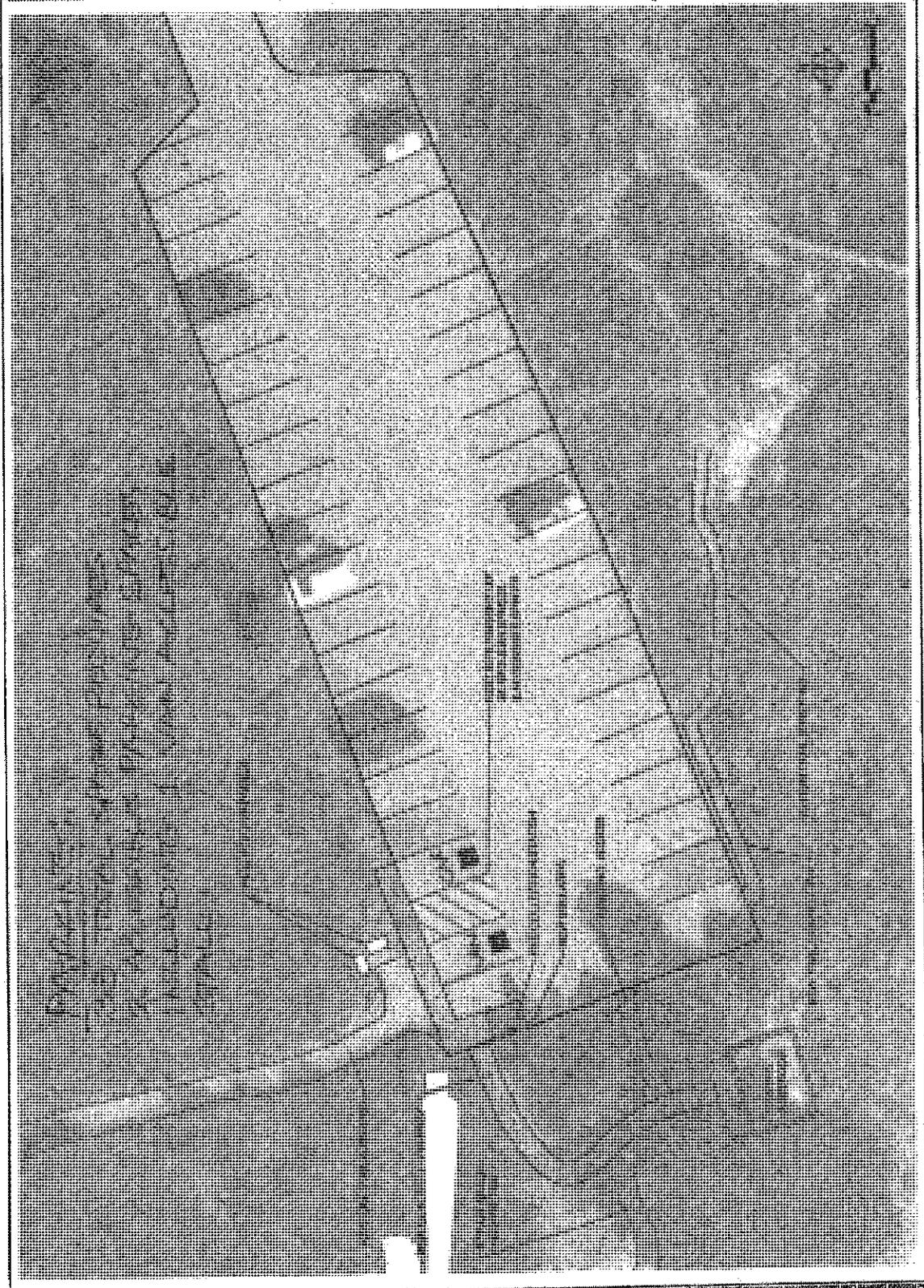
SONOMA COUNTY  
 PARKS AND RECREATION  
 2000 LANTANA DRIVE  
 SEASIDE, CA 95963

DATE	
TIME	
PERSONNEL	
VEHICLE	
ADULTS	
CHILDREN	
TOTAL	
REMARKS	

SHELL BEACH PARKING

SONOMA COAST STATE PARK  
 FEE COLLECTION STATIONS

STATION NO.  
 SHEET NO.  
 1-3  
 X of X  
 X of X









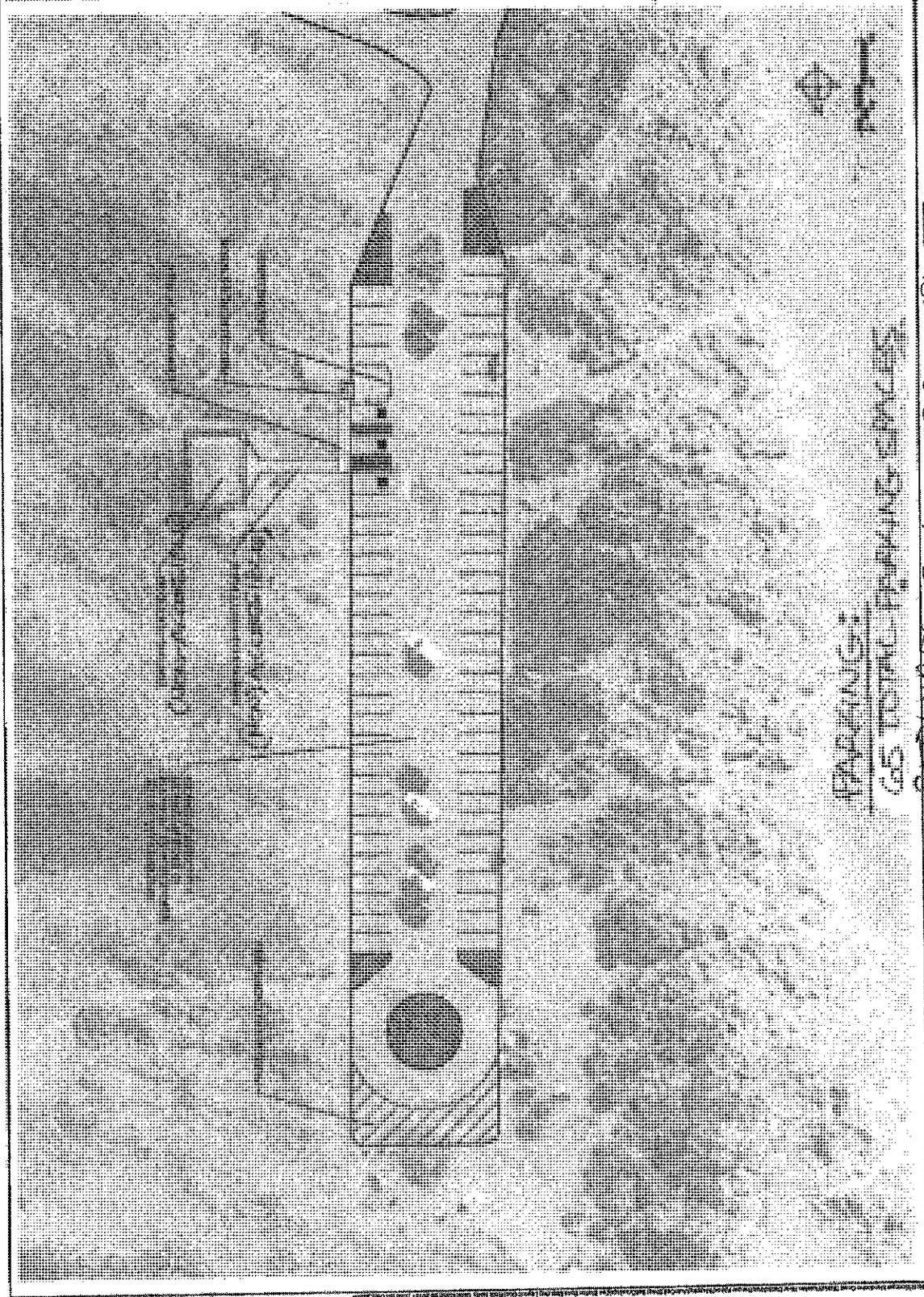
SONOMA COUNTY  
 DISTRICT  
 2881 STEWART BL.  
 DUNSMITH, CA

APPROVED BY:	
DATE:	
PROJECT:	
LOCATION:	
PREPARED BY:	
CHECKED BY:	
DATE:	
SCALE:	
REVISIONS:	

GOAT ROCK NORTH PARKING

SONOMA COAST STATE PARK  
 FEE COLLECTION STATIONS

REVISIONS  
 00000000  
 SHEET NO.  
 L-6  
 X OF X



PARKING  
 65 TOTAL PARKING SPACES

REQUIRES 3 ACCESSIBLE SPACES  
 INCLUDING 1 VAN ACCESSIBLE STALL





STAFF SEARCH RESULTS

SEARCH RESULTS FOR  
SEARCH RESULTS FOR



3



RECEIVED

MAR 10 2016

CALIFORNIA  
COASTAL COMMISSION

Mary Potje & David Humes  
14643 Eastern Ave  
Guerneville, CA 95446

3/7/16

Dear Nancy Cave,

David Humes and I are writing to say we are against the proposal to charge fees for parking at the beaches along highway 1 such as Shell Beach and I think 6 or 7 other beaches on the list. I believe there will be a hearing scheduled between April 12 and 14 in Santa Rosa. This letter is in response to a 2/25/16 article we read in the Sonoma West Times and News. We do not want to change the free access to these beaches. Please reconsider this proposal. Thanks.

Sincerely,  
Mary Potje  
David Humes

2/3/16

California Coastal Commission

Attn: Nancy Cave

45 Fremont St.

Suite 2000

San Francisco, CA 94105

RECEIVED

MAR 07 2016

CALIFORNIA  
COASTAL COMMISSION

My opinion is that we are taxed enough and this is overload! This is totally offensive to me having kiosks or pay stations at the entrance to our beaches! There are many people who wouldn't have the money to go to the beach anymore. There is alot of poverty and people who barely make enough for rent and food and you would be depriving them of the beauty of our our coastal beaches!

I think you need to listen to the people - no one wants this to happen, and we elected you. Too many decisions are made behind closed doors! At the final hearing will you be taking our questions and comments? You should be set up for it before this meeting so we can have our say,

Disgruntled citizen  
Christina Raymond  
Windsor, CA



p.s. I tried to email [SonomaStateParksAppeal@coastal.ca.gov](mailto:SonomaStateParksAppeal@coastal.ca.gov) and it would not email, said not a valid email address

RECEIVED

MAR 03 2016

CALIFORNIA  
COASTAL COMMISSION

**NORMA L JELLISON**

◆◆◆  
P O BOX 1636 ◆ BODEGA BAY, CA 94923  
Home Phone/Fax (707) 875-3799  
NORMALJ@SONIC.NET

March 1, 2016

California Coastal Commission  
45 Fremont St #2000  
San Francisco CA 94105

[SonomaStateParksAppeal@Coastal.CA.gov](mailto:SonomaStateParksAppeal@Coastal.CA.gov)

RE: Sonoma State Parks Appeal

Chair Kinsey and Commissioners:

Two sections of the Coastal Act are critical considerations regarding the fee proposal before you for the Sonoma Coast State Parks. The first, Section 30210 Access, in fact refers to the California Constitution - Article X Section 4 of the California Constitution. Section 4 of the California Constitution not only precludes the exclusion of the right of way to tidal lands for public purposes, it directs the Legislature to enact laws that give the most liberal construction to the section so that access to the navigable waters of the State are always attainable for the people. Section 30210 of the Coastal Acts says in carrying out Section 4 of the California Constitution "...maximum access shall be conspicuously posted and recreational opportunities shall be provided *for all the people...*". (emphasis added)

A second relevant section of the Coastal Act is Section 30213, which requires lower cost visitor and recreational facilities be protected, encouraged and where feasible, provided.

I point out these 2 sections of the California Coastal Act in particular as they have much relevance to this fee proposal. At its heart, the fee proposal is an impediment to access to tidal lands - the coast, our California commons, and is a social justice issue.

Sonoma County beaches provide free access to the ocean and the out of doors for a large population that depends on free access to recreational opportunities. Collecting fees has an oversized burden for these Environmental Justice Communities of Concern.

The \$3/hour; \$8/day fee proposed will disproportionately impact low income communities in Sonoma County. Many who live along the lower Russian River are low income, fixed income individuals, including many senior citizens, who go to the beach and/or walk the Kortum Trail as their only affordable recreation.

Both access points to the Kortum Trail, named in honor of Bill Kortum's dedication to unimpeded coastal access, would ironically be fee access only. Goat Rock State Beach and the Kortum Trail are the most direct; accessible coastal access points for those who live along the lower Russian River and well as for thousands of Californians who travel to the coast from inland areas. For many, fees to access these Sonoma Coast State Parks areas would preclude their access to the coast.

Similarly, people of color; especially Latino families from the county's inland cities - Santa Rosa, Rohnert Park, Sonoma simply do not have the money to pay the access fees. They depend on access to the coast for a free outdoor experience. The Sonoma County coast is accessible only by motor vehicle - a half hour to one hour trip. There is no transit of consequence as Mendocino County Transit operates one trip per day north and one south between Santa Rosa and Mendocino. Thus, the cost of gas already poses a significant cost of access to the coast for these Environmental Justice Communities of Concern. Talk of "working to find

Unlike in Southern California, where transit is available to the beach and dense urban communities paralleling Route One provide multiple opportunities to park and easily walk to the beach to avoid parking fees, this is not the case along the Sonoma Coast. The inevitable avoidance of fee areas would result in overflow of the, for now, free pocket beach gravel parking lots. Parking on minimal shoulders and walking on the narrow, curvy two lane Highway One is dangerous. Even more dangerous, social trails down hazardous erodable cliffs would not only have negative impacts to ESHA areas on those coastal cliffs, falls and the inevitable cliff rescues would create an added burden for local fire and emergency response personnel.

The citizens of California saved the coast, their taxes purchased the land and put it into trust in the hands of State Parks, passing the Coastal Act, a citizen initiative, to protect the coast in perpetuity. To now ask the public to pay to access what they fought to protect access to is more than disconcerting. It is an affront.

We recognize there is a shortage of funding for California's parks. The pattern of dis-investment in Parks is long running. The portion of general fund monies supporting the State Park's budget has been halved in little over a decade.

As with prior governors, the Resources Agencies - State Parks in particular - have not been a priority in this governor's budgets. The recommendations of Parks Forward to turn parks over to the private sector or public private partnerships are short sighted.

State Parks are every bit as important state infrastructure as roads and bridges. Both bring economic vitality to the state. For every dollar that funds the parks, \$2.35 is returned to the state's General Fund through economic activities in the communities surrounding the parks.

It is time for the Legislature to reverse this dis-investment trend. And it is incumbent on the Coastal Commission to uphold the Coastal Act and guarantee access to the coast for all, regardless of social or economic status.

Efforts to "encourage" monthly free days on the weekend and a reasonably priced local pass are empty words. Asking for accountability for the monies collected and expenditures, in support of fees, are other empty words. Permit conditions in Southern California regarding collections and expenditures have not been adhered to by State Parks. No accounting has been forthcoming from State Parks in the 4 years since the Southern California permit was approved with those conditions.

Despite the fact that this fee proposal was in consideration for three years and a budget of potential income and expenditures was asked for by the Commission one year ago when the appeal first came before you, State Parks has yet to be able to answer simple questions about how much money they expect from the fee proposal, how much it will cost to implement and what the money might be spent on **if**, as suggested, it stays local. There is no reasonable expectation that any permit conditions enacted this time around, would be adhered to either.

I strongly urge you to turn down this fee proposal in its current form. The public process for something as precedent setting as this fee proposal has been virtually non existent, save for a meeting called by your Commission staff. This, after State Parks denied public comment to the hundred plus people who came out on a rainy nite, with one week advance notice, by calling the meeting they hosted an Open House.

The fee proposal sets a precedent of great import and impact because 2/3 of the California coast is owned by State Parks!

We have been told that State Parks will issue an Initial Study, likely before you take this matter up in April. State Parks staff further stated that the Initial Study is precedent to issuing a Mitigated Negative Declaration. This despite, in its appeal last April, it relied on PRC Section 30603 (a) (5) calling the project a major public works project. A rather amazing assertion that a IS/MND is now appropriate, lacking environmental assessment of the proposed major public works project to so determine. All without a Public Scoping meeting, which State Parks feels is unnecessary because of the MND.

There has been no real effort to identify funding avenues to overcome the need for regressive fees. A dedicated vehicle license fee funding sources for State Parks should be investigated. While that measure failed when first tried, the fee was too high and was rolled out at the on set of a recession. Similarly, some have suggested use of a portion of ORV set asides to fund State park operations. In short, there has been no effort to identify a better method to restore funding for the State Parks and the state beaches that belong to every Californian.

Please embrace your obligations to the Coastal Act to ensure access for all to the coast.

Please deny this fee proposal as inconsistent with the intent and meaning of the California Coastal Act.

Yours truly,



Norma L. Jellison

Bodega Bay Resident and Coastal Advocate



## THE OCEAN FOUNDATION

COASTAL COORDINATION PROGRAM

February 29, 2016

California Coastal Commission  
45 Fremont Street #2000  
San Francisco, CA 94105

Via email to: [SonomaStateParksAppeal@Coastal.CA.gov](mailto:SonomaStateParksAppeal@Coastal.CA.gov)

### **Re: Please Oppose State Park Beach Fees on the Sonoma Coast**

Dear Commissioners:

Thank you for this opportunity to comment on the pending appeal related to California State Parks' attempt to impose new entry fees to unimproved day use gravel parking lots on the Sonoma Coast.

Taken in context, it is important to remember that the Bodega Head Nuclear Power Plant was the epicenter of one of the iconic battles that started the modern day conservation movement, and the entire Jenner estuary adjacent to Goat Rock was once supposed to be dredged and the gravel then hauled away by barge to build the Bay Area Rapid Transit system. Protracted organized opposition by the public stopped both of these inappropriate proposals and then public money was used to purchase both locations and put them into the State Park system so that similar future threats of coastal industrialization would not arise.

Public funding was also used to purchase other parklands along the Sonoma Coast, during several different time periods.

The efforts of a group called Citizens Organized to Acquire Access to State Tidelands, or COAAST, started out to prevent a proposed private subdivision at Sea Ranch from completely blocking public access to the spectacular coast there, and those grassroots efforts in turn snowballed into a statewide public campaign leading to the passage of Proposition 20 and the creation of the Coastal Act and the Coastal Commission. This was the last ballot measure in California to have an all-volunteer public collection of the necessary signatures to qualify the item for the ballot.

In light of these underlying events, it is easy to see why the public is now wondering why, in the lingering wake of an embarrassing scandal over fiscal malfeasance by the higher-ups at California State Parks, the public would now be expected by State Parks to pay for simple unimproved day use with portable toilets and gravel parking lots on lands that the public purchased for State Parks. The public saved these places, then bought the land and put it into State Parks, then passed the Coastal Initiative to ensure their access to these lands in perpetuity, so it seems obvious why the public now cannot understand why they are supposed to pay to go look at them.

Some key points on the State Parks proposal now at hand:

- (1) State Parks has not even considered that there will inevitably be displacement of large numbers of coastal visitors from proposed new pay sites to already-overcrowded sites elsewhere on the Sonoma Coast, exceeding all available spaces in capacity-limited parking lots and the ability of other sites to safely accommodate these newly-displaced visitors without damage to public trust resources.
- (2) State Parks' new fee proposal will unfairly result in substantially diminished coastal access by low-income visitors, by minorities, and by those in need of ADA access.
- (3) State Parks has failed to comply with CEQA requirements for a full analysis of cumulative impacts and proposed mitigations for their proposed new policies and fee-collection installations. The State Parks proposal is missing the required EIR that needs to fully disclose the extent of, and secondary impacts from, the presently-proposed Parks fee plan. No requisite "Scoping" process has been conducted, and no Tribal consultation process has been initiated.
- (4) State Parks has failed to quantify the inevitable loss of revenues to local coastal businesses if Park access fees are implemented as proposed.
- (5) Reputable studies of the type of fee-collection devices now being proposed by State Parks for the Sonoma Coast caution that such machines should not be deployed in any area prone to vandalism, a common night-time occurrence at unpatrolled locations along the Sonoma Coast for decades.
- (6) State Parks' fee proposal is inevitably going to result in illegal roadside parking on sensitive vegetation, trammeling of sensitive ESHA habitats, and an unpreventable intrusion of new cross-country pedestrian trails through wetlands and unstable soils as frustrated visitors proceed to access long-accustomed beaches and headlands on foot.
- (7) State Parks has failed to offer any prospective mitigations for their proposed new entry stations and fee-collection devices on the inevitable blockage of traffic flows on public roadways in an area plagued during many Holiday weekends with stopped traffic

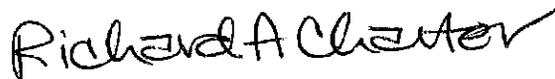
backups that already extend for miles and last for hours. Inevitable increases in emergency response time for public safety agencies along the coast need to be considered as part of comprehensive traffic planning by State Parks before further obstacles and impediments to traffic flow are arbitrarily put in place.

- (8) State Parks has failed to consider the impact of that agency's removal of trash receptacles and permanent closure of restrooms and the resulting effect of such closures on nearby beaches and natural ESHA areas identified in the Sonoma County LCP at Duncans Landing and elsewhere.

Please support the County of Sonoma's adopted concerns and oppose State Parks' fee proposal.

Thank you.

Sincerely,



Richard Charter  
Senior Fellow  
The Ocean Foundation

Andrea Kaufman  
14529 Redwood Lane  
Guerneville, CA 95446  
707-869-3911  
[andykaufman@comcast.net](mailto:andykaufman@comcast.net)

California Coastal Commission  
California State Parks  
Sonoma County Board of Supervisors

Re: California State Parks Sonoma Coast Fee Collection Proposal

February 24, 2016

I vehemently oppose this proposal because it will negatively affect local Sonoma County residents' access to the Sonoma County coast, which was the impetus for the formation of the California Coastal Commission in the first place. Charging fees for access to the California coast is a blatant attempt to balance the California State Parks budget on the backs of those who can least afford it, the low and middle-income residents.

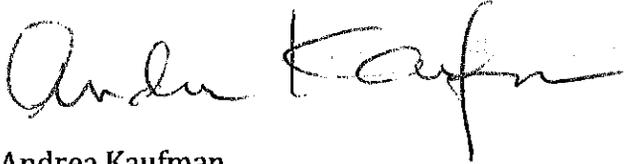
I actively volunteer with both California State Parks and the Greater Farallones Marine Sanctuary, and I spend a lot of time on Sonoma Coast beaches. I see first hand who uses these beaches, and it is overwhelmingly families – local families, families who deserve to enjoy access to their local beaches. They need the beaches, but the beaches also need THEM. These families, and particularly the children in these families, are the future of our environment. By learning about the ocean environment, they learn to value and protect that environment. Cutting off access to the citizens of our county is shortsighted and idiotic. And make no mistake, charging fees is indeed equivalent to cutting off access for low and middle-income families. Even if 'low income passes' are provided for, it imposes a layer of bureaucracy, and imposes hoops for families to jump through, and many will simply stop going to the beach instead. And what about families who don't qualify as 'low income', but who don't have the discretionary income to afford to pay for the beaches? This is simply not acceptable!

It is true that, as a volunteer with State Parks, I qualify for a State Parks pass, and it was suggested at the community meeting in Sebastopol on February 17, that all residents need to do is volunteer, and they too can qualify for a pass. This was a completely disingenuous comment! I have the luxury of volunteering because I am retired. I certainly didn't have time for such luxuries when I was raising a family and, as a single mother of very moderate means, I also could not have afforded to pay fees for access to my beaches. And my family spent a lot of time on those beaches and I grew to love them, which is why I volunteer now! Don't cut off this cycle for our current and future families.

Also, please keep in mind that this proposal, if implemented, will set a precedent for beaches on the entire California coast – not just Sonoma County. If this proposal is approved, it will make way for fee stations and iron rangers all up and down our state!

Please reconsider this misguided proposal, and find some other way to fund the State Parks on the California coast.

Sincerely,



Andrea Kaufman

RECEIVED

FEB 29 2016

CALIFORNIA  
COASTAL COMMISSION

Feb. 24, 2016

Nancy Cave and Coastal Commission staff  
Ca. Coastal Commission  
45 Fremont St. # 2000  
San Francisco

Re: Meetings in Sonoma county to discuss the State Park plan for iron rangers and kiosks on the Sonoma Coast beaches.

Dear Ms. Cave,

I attended the Coastal Commission meeting in Morro Bay and recognized clearly that Charles Lester's staff was in a great majority against his firing by the commission. I was there with Surfrider to add my voice in his support. I also attended last Wednesday's meeting in Seabastopol and tonight's meeting in Santa Rosa. The sign I made says "La Playa Es De Todos" on one side and "Keep The Sea Free" on the other side. My family is from El Salvador, Spanish is my first language but I am far from underprivileged. The Russian River is my home river and Goat Rock is my home beach having lived in Sonoma County since the early 50's. I've had a home in Jenner for over 22 years. I have taken part in not organized beach cleanups since before it was cool to do so.

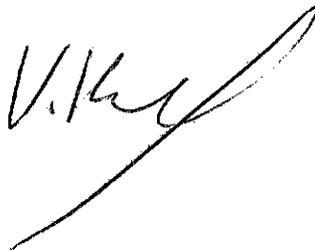
I am a member and volunteer instructor of Bay Area Sea Kayakers (Bask.org) a 500 member sea kayaking organization. We often launch from Goat Rock and paddle north to do rescue training and rock garden safety training. Some of our members travel from Nevada and Sacramento to train in the Goat Rock area. An added cost will make it tougher for them to decide to visit our coast.

Before going to Morro Bay and listening to the hundreds of eloquent citizens speak in support of Charles Lester, I was neutral on the issue of the iron rangers as I can just paddle to the beaches from my house. But after listening to dozens of people speak in favor of keeping the access for the poor and minority children of our society, I changed my mind and decided that yes, the experience of visiting the sea needs to be kept free.

Also, our Sonoma County Supervisors, although staying in front of the issue of coastal access, are quite challenged by their economic beholdeness to the wine industry (you can't get elected around here without wine industry money) which seeks to expand onto our coastal hills. The Supervisors are struggling with the elements of the Local Coastal Plan. That was touched upon tonight by a member of the Conservation Action group and also by Richard Charter. At the Russian River estuary at Jenner we also have trouble with leaking septic systems, and a county code enforcement dept. with staff that is unwilling to investigate claims of unsanitary conditions.

I support a strong Coastal Commission staff that is willing to look at the problems of coastal river health and help our county supervisors draft our Local Coastal Plan with some teeth. As it is now, it is toothless. Thanks for listening to the overwhelming amount of neighbors who will fight hard to keep our beaches free.

Victor K. Sund  
10847 Hwy 1, Jenner Ca. 95450  
707-4814608  
victorsund@comcast.net



RECEIVED

February 18, 2016

FEB 23 2016

California Coastal Commission

45 Fremont Street #2000

San Francisco, CA 94105

CALIFORNIA  
COASTAL COMMISSION

To Whom it May Concern:

I am writing today regarding proposed beach fees in Sonoma County. I attended a meeting last night in Sebastopol where the people from State Parks presented the plan to collect fees at our public beaches. There was overwhelming opposition to the plan but no formal opportunity for the public to respond. We had to be heard by rudely interjecting comments. This puts the State Parks people trying to run the meeting in a very uncomfortable position. I think there were about 125 people there, all opposed to the plan. It is unfair

to unveil this terrible proposal and expect all of these people to just sit there and listen and make comments two months later. I went around and looked at the maps but after a while I just felt sick. The idea of charging fees for these places! I didn't have any questions. I don't agree with this method of managing parks. I feel it is unethical. These parks are set aside for us because we have a need for human habitat. People need connection with nature. It helps our feeling of well-being and sanity. The beautiful scenes on our coast inspire people and give them beauty in their lives. Access should not be limited by charging money. By ourselves we could not afford these lands. But together we can maintain and enjoy these places. I also believe in free public libraries, free public bathrooms, free public drinking fountains, free public schools and free churches. I would have the same sick feeling if any of the above started charging money. These things provide for human needs and should not be collecting fees. It's not like buying a latte or a movie ticket, it's not a commodity, it's not a luxury item. It's something that people need to satisfy their souls. We should want to make sure that everyone can experience the outdoors. I am not comforted by the idea that most of the beaches will remain free. People use all of the beaches. On a sunny day on a weekend it can be hard to find a place to park! The fee collection is a bad precedent and I don't want to see it anywhere. Sonoma County Regional Parks has taken away free public access to most of our county



parks. I have lived in this county for 34 years and I have seen our parks go from being free to costing \$7.00 to park. They never even asked the voters and taxpayers. They set up pay stations without our consent. Once pay stations are set up, the price can be jacked up, and more can be added to the system. I disagree with collecting money for the parks in this way for five reasons. 1. There is no adjustment for how much an individual can afford. There were proposals in the documents for special rates for low income people, but they would have to apply. I don't agree with this approach. I think the money should be gotten from taxes so that people will be supporting the parks according to how much taxable income they have, not according to how much they like the beach! Wouldn't it be interesting to fund war and military

that way- only the people who think it's a good idea can fund it! I'm kidding, but the point is that these places belong to us all, and should be funded by us all according to how much we can afford.

2. The infrastructure needed to collect fees is a waste of money. We want the money for parks to go directly to maintaining the park- not to the manufacture and installation of pay stations and the surrounding fencing, concrete, or the paperwork, tickets, monitoring and citations that go with charging for parking.
3. It is a form of harassment to ask people for money every time they go to a public beach. It degrades the experience of going to the beach. It doesn't feel like this is our land and our park if someone is charging money.
4. Park rangers become parking police. I'm not sure if it would work the same but in Sonoma County Regional Park



rangers are the ones enforcing parking. I want the rangers to be seen as helpful people watching the park and making sure everything is okay, people you would trust and turn to if you had a problem, not the parking police!

5. It discriminates against individual users and short term visitors by making access proportionally less affordable.

***The beach I go to most often is Goat Rock, one of the proposed fee sites.***

The Russian River runs into the ocean there and there is an abundance of wildlife to watch- seagulls, pelicans, cormorants, ducks, harbor seals, etc. I have many pictures at the ocean over the years, but the majority are from Goat Rock. I probably went there 15 times this year. So you would charge me \$120 for going to this public park! I went to other beaches too! I am not comforted by the idea of a park pass. These are public parks and we are the public. We shouldn't need to buy a pass!

Basically, I would like to see the parks maintained

simply, as they have been. All the beaches need is a place to park and a bathroom. We don't need programs, we don't need manned kiosks, we don't need extra fencing. We just need a place to park and a bathroom, and some occasional trail work, for safety.

The meeting in Sebastopol the other night was the tip of the iceberg as far as opposition to the plan in this county. Last night's meeting shows how many angry people you can get on the spur of the moment on a rainy night. Wait until we get the word out! I really

think it's a waste of time and money to continue to pursue and develop a plan that is so thoroughly rejected by our community. Save a lot of time, money and frustration! Give this up now! 🍀

We need other solutions. I voted to reinstate the vehicle license fee, because I heard that it used to be a major source of money for the state parks until the governor ended it. At the time our parks were threatened with closure. I'm not opposed to paying for maintenance for parks through taxes or through a VLF. I just don't want to see pay stations at the entrance of places that are supposed to be ours. I would not be opposed to having some

limited concessions at certain locations if that could help make the money to maintain the parks. I don't know how other people would feel about it, but I think you could sell a lot of coffee, pre-made sandwiches and fruit at Goat Rock. There is already running water there, and there is room for a building. It would be something to help people's experience instead of ripping them off.

In summary, I think it is unethical, inefficient and works against our quality of life to charge people for daytime visits to their public parks. Please find another way.

Sincerely,

Barbara DeLonno

8175 Park Av, Forestville CA 95436

jarbarabean@comcast.net 707-887-9565



FEB 25 2016

CALIFORNIA  
COASTAL COMMISSION  
P.O. Box 55  
Jenner, CA 95450

22 February 2016

California Coastal Commission  
45 Fremont Street  
Suite 2000  
San Francisco, CA 94105

Attention: Nancy Cave

Dear Nancy and other members of the California Coastal Commission,

I was one of the attendees at the presentation of the Sonoma Coast Fee Collection Proposal by California State Parks at the Sebastopol Community Center on 17 September. I did not think to take a head count of folks who attended but a rough guess would be 150 to 200. When my husband and I arrived we assumed there would be a lively discussion with verbal input from a significant portion of this crowd. Imagine our surprise when we were told by the representatives from State Parks that there would be NO discussion of the issue and NO public input. There would be various tables set up in front of maps showing the proposed fee collection areas and representatives stationed at each map would answer questions individually.

The audience protested vocally and I believe unanimously that we had strong issues with the proposal that were not being heard, and also that nobody had explained why the fees were being proposed. State Parks was unwilling and it appears unable to explain the need for the proposed fees, present any sort of cost estimate (including construction, personnel required to maintain the kiosks, maintenance of improvements etc), or estimate of revenue that would be produced. The one justification we heard was that fees are charged at State Beaches in Southern California. I can't imagine going into any sort of presentation so ill-prepared.

The running of the meeting was soon taken over by the "Working Group" that State Parks named as providing input into the proposal. To a one the representatives of the "Working Group" stated that they did NOT support the proposal and gave eloquent and

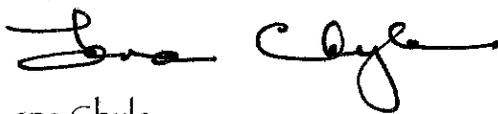
detailed reasons for its shortsighted inappropriateness. Eventually those in charge of the presentation realized they had no chance of convincing the public that their proposal was sound and individuals were allowed to speak.

Many concerns were presented that evening. I will state just three.

1. An estimate of cost vs. benefit must be developed for any proposal.
2. What will happen when people unable or unwilling to pay the fees park alongside the highway creating major safety hazards such as obstructing traffic, cars parked haphazardly, many pedestrians on the highway, all on a treacherous road with steep cliffs? Fence it and post "no parking" signs? How does that provide additional funds? How does that provide coastal accessibility to the public?
3. What about persons who cannot afford entrance fees, or parking fees much less an annual pass? For now anyone can go to the beach if they can get there. It should be a right as well as a privilege. Do we charge children to attend public schools?

In summary I ask that the California Coastal Commission reject the flimsy proposal by State Parks and advise that they look for funding elsewhere. I agree that California's State Parks are in disrepair and should be better maintained. But I also believe the management of the State Park system is severely lacking (Is this another case of the missing five million dollars?) and that our beaches should be free and accessible to everyone.

Respectfully yours,



Lena Chyle

Fees on Coast Parks

2/24/16

California has the 7<sup>th</sup> largest economy in the world. Only 6 countries in the entire world have more wealth. In the 50's and 60's, when our economy was much smaller, we were able to provide many more services for the citizens here. Not only were we able to maintain our coastal parking lots and restrooms without fees, we were able to build them. But now the State is acting as if it is broke. There are so many more of us, still paying the same taxes to the State, with more interest payments, fees, fines and taxes upon taxes being added continually. Now the citizens are broke. What is there to show for all this largess? The wealth of this State is being seriously siphoned off, and it is sucking the labor, creativity and life out of its citizens. California is being looted, and these coast fees are just another money grab.

Fees on our popular beaches will exclude the people who struggle to make ends meet (which is about ¼ of us by now) from ever seeing the beauty that is supposed to be ours to enjoy. The State would need to hire a civil servant to extract and enforce the fees, collect and disburse the money. So most of the population of the State would be excluded from the coast so that a civil service job can be created.

I object to the fees. We pay the government to serve us, not to extract our life energy and means of support on this planet. People come before the government, and if the government can't stay solvent, it must go down before the people do.

So, no.

Bonnie Chase

Cazadero, CA

February 24, 2016

Nancy Cave  
CALIFORNIA COASTAL COMMISSION  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105 - 2219

RE: Sonoma County Fee Collection Proposal  
California Department of Parks and Recreation

As a longtime resident of the Sonoma County Coast, I firmly believe our beaches belong to everyone and should remain free for all to enjoy. With the latest proposal, my main concerns are with fee collection at Bodega Head, Goat Rock and Shell Beach.

Bodega Head has been utilized by generations of fishermen to determine weather conditions before leaving port in Bodega Bay. It is important that this location remain free of a manned fee station as 24 hr. access is critically important. Bodega Head is also considered the prime location for whale watching along the Sonoma Coast. Volunteers are present on weekends to inform and educate visitors as to the lives of these magnificent creatures. It is imperative that this site remain free.

As to Goat Rock and Shell Beach, this stretch of coastline is one of the few locations that can be accessed by everyone; young and old and the handicapped. Both of these locations provide access to the Kortum Trail, a part of the California Coastal Trail proposed for the length of California. It would be both immoral and illegal for the State of California to proceed with their plans for fee collection at this site.

Bodega Bay, home to the California Coastal Act, thanks you for your efforts to keep our beaches free on behalf of the people of California.

Margaret Briare  
P. O. Box 998  
Bodega Bay, CA 94923  
[briarepach@aol.com](mailto:briarepach@aol.com)



2/24/16

To: California Coastal Commission and Staff: Jack Ainsworth, Dan Carl and Nancy Cave, et al:

I am here today to voice my opposition to establishment of the "Iron Rangers" on the Sonoma Coast.

I am an award winning environmental activist. (See resume at [www.thetreeclimber.net](http://www.thetreeclimber.net)). I have served on the Sonoma Coast State Beach Advisory Committee for 20 years, prior to Ruth Coleman and Liz Burko discontinuing the Committee's function. I would like to describe just three of the situations that have occurred within the Russian River District Management over the years, that demonstrate the loss of public trust in parks' management and the pattern and practices that have caused serious environmental damage to our Parks.

Although these sighted situations took place in Armstrong State Reserve, they were perpetrated by the same mismanagement techniques that are proposed here today:

1. In 1989, then District Superintendent Ron Henshaw put in the first Iron Ranger at Armstrong State Reserve. It went over like a lead balloon. We held numerous meetings with the public, politicians and Park management.

At one of the meetings, Mr. Henshaw, when asked if he would meet with our State Senator, Barry Keene, and State Assemblyman, Dan Houser and County Supervisor Ernie Carpenter told us that those are Democrats and he was a Republican, his boss Henry Argonia was a Republican and that the Governor was a Republican. Senator Keene got upset and as he was a stickler for the Democratic process, it was found out that Mr. Henshaw went on ROTC paid training every year but he was not in fact a member of ROTC. He was subsequently demoted and transferred. In the meantime, I filed a lawsuit against State Parks (CEQA). The Russian River Chamber of Commerce Board of Directors sponsored the filing fees and Attorney Gary Weiner went pro-Bono, representing us (Gary is now a staff attorney arbitrator for the California Appellate Court.) The attorney general's office called us and said that they would not represent State Parks because this Iron Ranger project violated CEQA.

2. In 2012 in Armstrong State Reserve, under the guise of ADA compliance, State Parks maintenance staff, without public input, or a proper environmental review, placed and compacted every walking trail in Armstrong using type 2 aggregate adjacent to many of the old growth trees. Asphalt, cement and type 2 aggregate causes oxygen depletion to the Redwood trees through compaction. I was unable to stop this project at the time as I was undergoing chemotherapy treatment. Future visitors to the Park will see the long term effects of this damage done.

3. In 2015 State Parks District Management proposed spending in excess of one and a half million dollars for placement of a 8" diameter water pipeline, 30 feet below the forest floor. We were told that this was required by the State Fire Marshall.

When we pressed Project Manager, Patti Dumont it was discovered that there was no correspondence from the State Fire Marshall's office. Patti Dumont was then removed as Project Manager. The first public meeting was so poorly advertised by Parks that I was the only member of the public in attendance. For the time being, we have been told that this project has now been dropped.

In conclusion, it is ill advised to think that we, the citizens of Sonoma County, would allow Parks to perpetrate yet another boondoggle.

For the record, what happened to the 57 million dollars embezzled by Ruth Coleman? Did it ever make it back in to State Parks coffers?

Sincerely,

Darrell B. Sukovitzan  
[darrells@sonic.net](mailto:darrells@sonic.net)

P. O. Box 849  
Guerneville, Ca 95446

## Thoughts on Sonoma Coast SP Fees

### CEQA

#### When Does a Lead Agency Determine the Appropriate Level of CEQA Review?

- The intent of CEQA is to identify and disclose potential environmental effects of a lead agency's actions; to involve the public and other governmental agencies in project planning and review; and to identify reasonable and feasible measures to avoid or minimize potential impacts on the environment. It is not just a paperwork process with a predetermined outcome. Preparation of a CEQA Initial Study is fundamental to identifying impacts, developing mitigation, and assisting the lead agency to determine if changes as a result of project implementation would be significant. At the 2/17/16 DPR meeting in Sebastopol, DPR representatives stated that the Initial Study is not done; yet it was also stated that a [Mitigated] Negative Declaration [M]ND will be prepared. As a CEQA professional for over 20 years, I am concerned and unclear how this determination has been made without full consideration of potential impacts, avoidance and mitigation measures, and findings of significance in a completed Initial Study.
- Bottom-line question is on what basis has DPR made the decision that there is no "fair argument" that specific impacts cannot be reduced to a less-than-significant level? If such an argument can be made, an EIR is required.

#### Are CEQA Scoping Meetings Appropriate?

- Clearly, those citizens present at the 2/17/16 event thought they were attending a meeting in which their concerns and ideas would be heard—what is referred to as a "scoping" meeting that occurs before an environmental document is circulated for review and comment. When queried during the break-out session, DPR's representative's response was that scoping meetings are not required since the decision to prepare a [M]ND had already been made. However, a lead agency may always choose to conduct scoping meetings in order to inform the CEQA process and to honor the spirit of the Legislature's intent that CEQA be inclusive.
- If the project is indeed "of statewide importance" triggering CCC appeal, surely scoping to receive public input from those who have far more knowledge of the issues of local concern and potential impacts of the proposed project than someone in Sacramento would be beneficial. Although one can comment on a CEQA document during the official public comment period, it is not the same as helping to define the project. Once circulated, the only recourse available to the public if there is disagreement about the findings in a published CEQA document is in the courts.

#### Other CEQA Issues of Concern

- What other alternatives were considered?
- What consultation with Caltrans has occurred? What are their requirements/conditions?
- How are potential impacts from social trails created by folks who choose not to pay the fee and park along the road (e.g., sensitive habitat degradation and erosion) to be mitigated to a less-than-significant level? How is public safety to be addressed for folks who choose to park along the road? How are visual effects from future no parking signs to be mitigated to a less-than-significant level?
- What outreach has occurred with local Tribal representatives? What are their concerns?

#### Other Issues of Concern

- What are the financial projections and business plan (i.e., why are these fees needed; what is the financial goal; what will it cost to implement; what will it cost to run; how much will it earn)?
- How has the issue of social injustice been considered, and what measures are proposed?

*Submitted 02/24/16 by Kathie Lowrey ([Kathie@pcz.com](mailto:Kathie@pcz.com)); 200D Foss Creek Circle, Healdsburg, CA 95448).*

RECEIVED

FEB 24 2016

CALIFORNIA  
COASTAL COMMISSION

Carol Sklenicka  
Richard Ryan  
P O Box 21  
Duncans Mills CA 95430

February 20, 2016

Nancy Cave  
California Coastal Commission  
45 Fremont Street – Suite 2000  
San Francisco, CA 94105-2219

It's not surprising that the proposal of the California State Department of Parks and Recreation to charge fees in new locations on the Sonoma Coast has met with vociferous opposition. I hope some of you remember that similar proposals have been resisted here before, at least since 1979. We are the home country of Bill Kortum and his spirit lives on here.

Many opponents believe that the requirement of fees for parking at the most accessible locations along our coast is a violation of the Coastal Act. It seems there is basis for a court challenge on those grounds.

What disturbs us about this proposal is that the Parks Department has not deigned to explain what benefits their scheme might bring to park users. Will roads, beach access, restrooms, garbage collection be improved? Will more rangers be provided to insure public safety? The so-called "open house" meeting they held in Sebastopol on Feb. 17, 2016 answered none of these questions. It seemed that the administrators were ill-prepared to recommend their own short-sighted proposal. It seemed they had been ordered to come up with something and acted in frustrated

desperation. Surely someone in Sacramento has a better idea than this.

We all know that there is a shortage of funding for the parks. Yet no one behind the tables at the meeting in Sebastopol could tell us how much it will cost to install and staff these fee collection stations. It seems very likely that the cost will be as great as the revenue brought in. Apparently no one has analyzed this equation. The whole plan is half-baked and it is opposed by most or all of the organizations that were invited in to consult with the Parks personnel in designing the plan.

Some of the locations where mechanized fee stations are slated for installation have no services at all, Freezeout and Willow Creek. I think Willow Creek is a county road and it is so pot-holed it is drivable only in SUVs. Freezeout has been managed by Landpaths until last month and was open only by permit (but free for those who attended permit orientation).

We strongly urge you to reject this plan and to support legislative efforts to restore funding for the state beaches that belong to every Californian.

Sincerely,



Carol Sklenicka



Richard Ryan

February 23,  
2016

My name is Ruby Cooper, and I am thirteen years old. I have lived on the Sonoma Coast my whole life. My brother and I are homeschooled and going to the beach is one of our favorite activities. If the law is changed and we have to pay to go to the beach, it will soon become less and less of a regular activity. Going to the beach is something that should be free to everyone. I feel very strongly about this, because the beach is a natural place of beauty. Nature should be free for everyone to enjoy, not just people with money. Not only is it a place to relax, it is a place to learn and have fun, as well as volunteering to help clean the beach.

I strongly urge you to protect the Sonoma Coast for all people and creatures alike.

Concerned Coastal  
Resident

Ruby Cooper

Hello my name is Joe and I'm 11 years old and I have lived on the coast my whole life and I don't think that it's okay to have to pay for the public beaches because then I can't go so often. The fact that you are trying to pass the law that would make me have to pay to play on the beaches of Sonoma county, seems very unfair to the families of the coastal residents.

Thanks for your time and I hope you will do the right thing.

Sincerely Joe cooper 2/23/2016

JOE  
COOPER

2.23.2016

02-24-2016

To whom it may concern:

I have long used State and Federal public access lands for recreational enjoyment. As the use of this land was intended for "common people" to use and enjoy, I am vehemently opposed to any measures that may increase restrictions on this land use or raise costs that create hardship for the middle and lower classes of our society.

Before land developers and corporations brought their influence over the Coastal Commission to a new level, many may have taken this land use for granted. But, now, with the firing of California Coastal Commission Executive Director, and environmentalist advocate, Charles Lester, it has become crystal clear that big money has crept into another bastion of American Freedom and is eroding our past amenities to the degree that there may be a time when there will be no more such land to which the common man can go as was intended by some great founders of the American way such as Thomas Jefferson, Teddy Roosevelt and Jimmy Carter.

Please do not let these greedy and malevolent powers guide our future into an Orwellian type existence where the only visions of beautiful natural landscapes and unfettered wildlife might only be viewed on scratchy old films of ancient history and better times-gone-by.

Thank you,  
Lorrie Uribe

22194 Ruoff Road,  
Jenner, CA 95450

To the California Coastal Commission-  
Feb. 24, 2016

Nature is a prescription for the society's mental health. Please note my family and immediate community's strong objection to the charging for parking at our coastal beaches. We live in the coastal zone, and the beaches are our back yard. The coast is the refuge that people everywhere stream to, to find untainted nature for restoring themselves from the stresses and strains of everyday life.

So often it's just a moment to be in a wild spot that we are seeking— a few minutes out of a day. We do not need to impose impediments, obstacles and deterrents to accessing our unfettered wild places. Blocking the way for teachers with classrooms, families who seize a moment to share the wonder of nature together, roamers, walkers, with a few moments to stop and see the wonders....All need to have easy access. Charging for entrance to the wilds is twisted logic. Please keep our remaining free coast free for all of us.

Thank you,

*Tom, Claudia, Adam, DAMON, Kara Giacinto*

Claudia, Tom, Adam, Damon and Kara Giacinto  
22110 Amanita Circle  
Jenner, CA 95450

Feb 24th 2016  
To the California Coastal Commission

We have lived in West Sonoma County since 1978. The beaches are a constant resource for us, our family and our friends. For us, it is the break from the hustle & bustle of everyday lives and a brief respite from a crazy world.

We have spent countless hours over the past 4 decades cleaning litter, working on several oil spill cleanup projects. We hike, camp, surf, swim, relax, play music. For decades we have taken the time to teach family and friends, young children the value of taking care of our beaches and the environment, teaching them not to take it for granted but appreciate it for the jewel it is.

Many families we know would not afford the luxury of going to our beaches if there was to be a charge. Our beaches are a place of beauty for all of us to enjoy, please don't take that right away from us. It is written in the constitution for us to have beach access. How can we ignore that, if we deface the constitution what are we really teaching our children? We plead with you to not charge for parking at our coastal beaches.

Respectfully

Cathy & Dennis Schezer  
P. O. Box 115  
Cazadero, CA 95421

February 23, 2016

Nancy Cave  
California Coastal Commission  
45 Fremont Street - Suite 2000  
San Francisco, CA 94105-2219

The proposal of the California State Department of Parks and Recreation to charge fees in new locations on the Sonoma Coast has been resisted more than once over the years. I realize Northern California is something of a holdout but we stand for the way things should be, in the spirit of the Coastal Act.

The Parks Department does not seem to have much of a plan in all this. Costs, numbers of rangers on duty, and improvements and benefits are not even specified. Personnel from Sacramento sent to Sebastopol on Feb. 17 to push this proposal on the public were really clueless about the area and just taking orders from above. The public came up with several better ideas that could be implemented with much less expense, trouble and offensiveness.

I am a 41-year resident of lower Willow Creek Rd. and find it a pointless choice for a kiosk. This county road is in deplorable shape and there are no parking or other services except for one of two campgrounds that currently opens in season, and one hiking trail.

Please work creatively with ideas presented by the public and with more sensible and practical legislative efforts to restore funding for our state beaches, especially in a time when the pressures are so great to develop our coast and to squeeze more out of the income-challenged.

Thank you for caring.

Sincerely yours,

Kate Fenton  
PO Box 86  
Jenner, CA 95450



# *Stewards of the Coast and Redwoods*

## *Preservation through Education & Stewardship*

Southern Russian River Sector State Parks

February 23, 2016

To Coastal Commission Staff:

Stewards is an 800-member organization that continues to have a neutral position on parking fees on the Sonoma Coast, due to the varying viewpoints expressed to us about this issue by our members.

Stewards does however strongly support a public process for expressing opinions, issues, concerns and to satisfy CEQA. For this reason, we appreciate this opportunity provided by the Coastal Commission staff to hear our views. We also applaud the efforts by local State Park Superintendent Mike Lair and Environmental Scientist Brendan O'Neil for holding a series of stakeholder meetings to make recommendations that addressed community issues. Their efforts resulted in a reduction of proposed fee locations as presented at last weeks Open House.

Advocating for a sustainable funding source to adequately support our struggling State Park system continues to be a primary goal for Stewards. Such a funding source would alleviate the need for new fees. Since park closures and service reductions became a reality, Stewards stepped up to operate Austin Creek SRA and we have also been paying to keep the Visitor Center and public restrooms open in Jenner. Our local park management staff are gradually reopening service reduction areas but this doesn't mean that there still isn't a strain on the limited staff resources that are available for maintaining these coastal facilities. We believe more effort needs to go into appealing to our State legislators to fund our park system.

We appreciate legislators, like Senator McGuire who are proponents of using tax revenue from the eventual sale of legal marijuana to fund State Parks. It makes sense considering the damage done by illegal pot grows on public lands and what it has done to our natural resources in places like Austin Creek SRA and Salt Point SP. **We encourage the Coastal Commission to delay their decision for new Sonoma Coast fees until this proposal has a chance to become the new funding source for our State Parks.**

**If the Coastal Commission should approve new Sonoma Coast fees:**

- Stewards strongly encourages a reasonably priced local pass for all Sonoma County State Parks, not just coastal parks.
- Stewards also supports monthly free days on the weekend so all park visitors can enjoy coastal access regardless of their socio-economic situation.
- We also feel that a phasing in process would be appropriate and a monitoring plan to determine whether or not expected revenue projections are being realized.
- In addition, we recommend that an Oversight Committee comprised of stakeholder organizations continue to be involved in regular meetings with State Parks to maintain good communication about coastal issues.

Thank you very much for your time this evening.

Michele Luna, Executive Director

**PAMELA STONE SINGER**  
**P.O. Box 684, Occidental, CA 95465**  
**pamelasinger@sonic.net**

February 22, 2016

Nancy Cave  
California Coastal Commission  
45 Fremont Street – Suite 200  
San Francisco CA, 94105

In the 1980's, I lived in Timber Cove not far from the Kashia Pomo reservation. My family and I established a close friendship with some Pomo families and we are all still good friends. We have attended and still attend their ceremonies, funerals and we visit with each other often.

The spiritual leader, Mr. Lorin Smith, travels regularly to Bodega Head and has for as long as I've known him. Mr. Tom Smith, Lorin's ancestor, is buried at Bodega Head. Lorin travels there to speak with his great grandfather.

If the California Coastal Commission plans on collecting \$8.00 a day for people to visit coastal areas, few Pomo's I know would be able to afford this fee, much less the \$65 for a year. Consequently, they would not be able to visit their ancestral grounds.

These visits to the ancestors along the coast are vital to the Pomo culture which is a living culture. It is imperative that the Kashia Pomo have access to, at the very least, Bodega Head, Goat Rock and Stump Beach.

As for the importance of Goat Rock, Lorin told me that legends say the Kashia Pomo hoisted their dead to the top of Goat Rock with leather ropes where they returned to the sky. Myths, legends and stories passed down from generation to generation are important in keeping a culture alive.

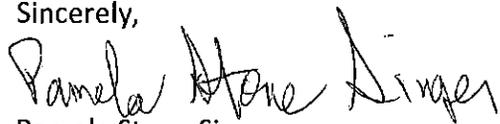
The land around Stump Beach is where Lorin and his assistants find the herbs needed for healings, teas and medicine. They also gather seaweed on the shore which they dry and eat. This too highlights the need for the rights of indigenous people to be respected.

Ultimately, this issue is about the rights of all people to freely access the nourishing qualities of the natural world. Our spirits, along with our mental and physical well-being must have this connection.

My husband is a surfer and calls the sea his "church." He teaches at a school in Santa Rosa for mentally ill and emotionally disturbed adolescents. If he had to pay every time he surfed for coastal access, his well-being would be compromised.

This is of course, true for everyone who seeks solace on the coast for a break from our fast-paced society.

Sincerely,

  
Pamela Stone Singer

## **Cave, Nancy@Coastal**

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**From:** Pamela Singer <pamelasinger@sonic.net>  
**Sent:** Monday, February 22, 2016 10:31 AM  
**To:** Cave, Nancy@Coastal  
**Subject:** regarding the Pomo people

Hello Ms. Cave,

I am the woman who spoke with you at the meeting last Wednesday, February 17th in Sebastopol. I told you that it's imperative for the Kashia Pomo to have access to, at the very least, Bodega Head, Goat Rock and Stump Beach. These are sacred grounds.

Years ago, I lived in the Timber Cove area not far from the Kashia Pomo Reservation. My family and I became close friends with a few families up there and we're still friends. The spiritual leader at that time, Lorin Smith, used to travel to Bodega Head to speak with his grandfather, Tom Smith who gave Lorin advice and personal power so that Lorin could be the great healer that he is. Other types of communications also passed between them.

If The California Coastal Commission plans on collecting \$8.00 a day for people to visit these coastal areas, no Pomo I know would be able to afford this, much less the \$65 for a year. At times, some families on the Kashia Reservation can't pay their bills and have little food to eat.

As for Goat Rock, legends say that with leather ropes, the Pomo hoisted their dead to the top of this rock. Myths, legends and stories passed down through the centuries are important in keeping a culture alive.

The land around Stump Beach is where Lorin and others go to find the herbs they need for tea and healings. This is also true for the Pomo's before them.

It is vital that the rights of indigenous people are protected.

I look forward to seeing you and discussing these matters further with you this Wednesday.

Thank you

Pamela Singer

2/29/16

*I am Reuben Weinzyeg, a member of the steering committee for Preserve Rural Sonoma County and a coalition of Northbay groups representing over 10,000 members and I am presenting this statement on their behalf.*

In our opinion, the current proposal is too sweeping to be approved and is a violation of the public access and environmental provisions of the Coastal Act and is additionally a violation of our existing Local Coastal Plan.

There have been no revenue/budget/cost analysis presented to support that this will generate enough fees to allow for any of the money collected to stay local...it goes to the general fund in Sacramento with no guarantee that the funds go to Sonoma Coast Parks or any parks for that matter.

Aside from the fee issue, we have overarching concerns that the soon to be presented Draft LCP Update is aimed to attract a larger population of residents, farms, industry and recreationalists in an especially hazardous region, while largely misrepresenting or ignoring the coastal zone's water supply limitations. It also allows expanded viticulture, wine production, and sales of alcoholic beverages, in a region where far too many people already drive too fast on unavoidably hazardous narrow and sinuous roads.

and  
ecological  
impact.

The Sonoma County coastal zone is characterized by steep slopes, narrow and winding roads, and limited water resources. Coastal areas already attract heavy crowds in both hot weather and winter whale-watching and bird watching seasons. Promoting additional tourist attractions and population growth, with attendant cumulative impacts, will become destructive to the zone.

The Draft LCP Update makes statements about the delicate balances of coastal ecosystems, but provides no assessment of current uses that threaten those balances, nor any analysis of how much additional urbanization, and (or) agro-industrial development can be added without fatally disturbing those already disturbed balances. The proposed LCP Elements contain language that will prime the County to open the coastal zone for greater exploitation, while proposing broadly equivocal standards for evaluating the "balances." The greater public cherishes the Sonoma Coast because it is unique, natural and not highly developed.

Draft LCP Update does not address this issue and presents no data for doing so. There is no discussion of indicator species, where they are, if they are

monitored, or how any of the kinds of development discussed in the LCP Update Elements might affect them

The coast preserves a number of unique plant communities, but much habitat has been lost to development already, along with the wildlife that depended on them. We suggest that this LCP requires a new Environmental Impact Report to assess the current levels of ecosystem function and tolerance for additional development. It should evaluate whether or not the earlier build-out targets are still feasible, and which will or will not disturb the already-threatened balances.

And finally, we suggest that the same kind of study be done to assess the impact on local human populations of the proposed fees being considered for beach access. That analysis should account for the environmental, public safety, and social justice impacts of pushing people that can't afford fees to the remaining free roadside pullouts.

CCC – 2.24.16 Public Hearing Notes

My name is Darren Wiemeyer. My address is 4920 Hansen Drive in Santa Rosa.

I was born and raised in Santa Rosa and I work as an independent biological consultant. I am also the President of the Rock Ice & Mountain Club. The Rock Ice & Mountain Club represents rock climbers and outdoor enthusiasts of the San Francisco North Bay.

I would like to commend the local State Park's staff for their tireless and sometimes thankless work on this project. I understand the complexity of this project, the environmental constraints and the budgetary issues with the State Park system.

I do not support the State Park's proposed fee program. I believe it will limit access for lower socio-economic residents and travelers and will negatively impact local businesses.

It will result in the avoidance of fee areas and increase the use of unsafe highway pullouts along the coast. This could result in damage to sensitive habitats and trampling of vegetation from people trying to access bluffs and beaches.

Specifically, I am against the location of the goat rock kiosk as it will eliminate essential parking and access to the sunset rocks. The sunset rocks is THE primary climbing destination in Sonoma County for rock climbers and permitted groups who use this beautiful location for teaching climbing and outdoor stewardship to people of all ages.

I would urge the Commission to uphold the Sonoma County Board of Supervisors denial of the State Park's fee proposal along the Sonoma Coast.

*Suggestions -*

2/24/16

Hello members of the Coastal Commission. Thank you for coming here this evening to hear our voices on a matter that is close to our hearts.

I am here as a representative of our local rock climbing community which is opposed to the suggested State Parks fee proposal at Goat Rock State Beach. Specifically, we are concerned with loss of access to Sunset Rocks, which is along the Kortum Trail off Goat Rock Road. This small cluster of coastal boulders are a resource of great significance to the Rock Climbing Public from around the Bay Area. The State's proposal will eliminate approximately twenty roadside parking spaces which are critical to access for climbing at the Sunset Rocks. In their place, a considerable development will be built that entails three traffic lanes and a manned kiosk. With this development and resulting loss of access, we ask that you reconsider the State Park claim that the Fee Proposal does not inhibit maximum public access to existing recreational resources.

This evening you will hear statements from several key leaders of the climbing community: Darren Wiemeyer, president of the local Rock Ice and Mountain Club, Gorden Cooley, Owner of the Vertex climbing center, Jeremiah Kamolson, Executive Director of the Brad Parker Foundation, Tom Addison, our regional representative of The Access Fund, and Professional climber Kevin Jorgeson who was a member of the team that climbed the Dawn Wall in Yosemite last year. Like many Sonoma County climbers, Kevin's very first rock climb was made at The Sunset Rocks at age 10.

While we are all sympathetic to the Park's need to generate revenue, the concern rock climbers have is not simply one of whether or not the Park can or should charge fees to access local parks, but rather the loss of access itself with regards to this important climbing resource. If implemented as is, we will lose essential parking spaces that are used by kids summer climbing camps, adventure programs for at-risk children, climbing education, volunteer stewardship days and recreational climbing.

Though our combined programs support the funding of the parks through permit application fees to run programs and classes at this site, the climbing community has not been included in planning discussions. After learning details of the Fee Proposal at the State's "Public Hearing" last week, we scheduled a meeting and met with planners in Duncan's Mills to discuss the issue. A solution could not be reached and we now feel forced to oppose the Fee Proposal at Goat Rock as it stands. With the loss of these parking areas there will be a substantial, undeniable impact to our user groups access. We ask you to take this matter into great consideration and we welcome a productive dialog.

Again my name is Jerry Dodrill, Photographer, Vice President of the Rock Ice & Mountain Club.

## Lavine, Ethan@Coastal

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**From:** Michael Lockert <mlockert88@gmail.com>  
**Sent:** Monday, November 16, 2015 10:40 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** admission charges for beach access

Dear Mr. Lavine,

As a resident of Sonoma County I am greatly disturbed by the potential of charging fees to access state beaches at the Sonoma coast. or anywhere for that matter. People of Sonoma County frequent the coast for many reasons- recreation, renewal, a chance to escape the workaday world and be in the awesome beauty of Nature. Not to mention maintaining our health.

Many of us live paycheck to paycheck and have difficulty coming up with additional funds to afford beach access which should already be payed for through our taxes.

It's my understanding the public in California is guaranteed access to the coast as a matter of principle and law, as it should be.

Please don't exacerbate the inequality of income in California even more by adding one more burden to the people. The Coastal public lands belong to us all.

Please do everything in your power to resist charging to enjoy our beaches and coastal lands.

Thank you,

Michael Lockert

**Lavine, Ethan@Coastal**

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**From:** Russell Wells <pelican@sonic.net>  
**Sent:** Thursday, October 29, 2015 11:52 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Coastal Access Proposal

I am a retired teacher and counselor, living in the coastal region at Timber Cove/Ft. Ross. In the past 15 years I have seen increasing industrial use of the once-pristine area around my home, *due to the increasing number of wineries, vineyards and the combined use "event centers"*. This is appalling, and I am speaking from a spiritual perspective as well as a practical one.

I love the coast, and before I moved here, I enjoyed visiting such lovely, sacred healing places. In my work as a spiritual counselor, I saw the benefit of being outdoors surrounded by the natural inherent beauty in these areas, as well as being nurtured myself when I had cancer. These coastal lands need to be preserved for the enjoyment of generations to come, and we must not be discriminatory by charging such fees to those who cannot afford to pay them. We all need to learn how to become good stewards.

Therefore, I propose that these corporations, families and private individuals who own and operate these *wineries/event centers* be taxed and billed for their use of these common areas, AND that all parking fees for any area be abolished. Many of our local non-profit stewardship organizations are working to keep areas clean and accessible for everyone and they do a superb job with only donations. I think the taxes/fees paid by these wealthy companies should insure that we all have clean, safe coastal access in perpetuity.

Thank you for your attention,

Reverend Kathleen Lassiter  
Timber Cove

CA Coastal Commission  
North Central Coast District Office  
ATTN: Ethan Levine, Coastal Analyst  
725 Front St, Suite 300  
Santa Cruz, CA. 95060-4508

October 8, 2015

Dear Ethan Levine,

I'm writing because I do not support  
the Sonoma Coast Iron Rangers program.  
Please have the CA Coastal Commission  
work with the County of Sonoma ~~and~~ to  
protect public access to the Sonoma Coast.  
Iron Rangers do not support public access  
to the coast.

Thank you,

Ronald Goldberg  
1676 Jennifer Drive  
Occidental, Ca. 95465

RECEIVED  
OCT 16 2015

CALIFORNIA  
COASTAL COMMISSION  
CENTRAL COAST AREA

A-2-SON-13-0219

Exhibit 11

Public Correspondence

Page 144 of 476

**Lavine, Ethan@Coastal**

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**From:** Russell Wells <pelican@sonic.net>  
**Sent:** Sunday, September 13, 2015 8:17 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** No Iron Rangers!

Dear Mr. Levine,

Access to beaches is supposedly guaranteed by the 1976 Coastal Act. Access is not guaranteed when a fee is charged; on the contrary, those who don't have the fee are guaranteed *denial* of entry.

This deplorable hypocrisy, of charging a fee whilst pretending that the beaches are "publicly accessible", is already obnoxious. Now the proposal is to compound this by making all remaining free public places into places that only those who can afford them can enjoy.

The parks used to be free. What happened? The parks used to have enough funding without resorting to this insulting expedient. Where did that money go? And why? What worthwhile war is it funding now, what new tax is sucking it up?

The policy of charging for any park access in California should be rejected, *and reversed*.

Sincerely,

Russell Wells

## Lavine, Ethan@Coastal

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**From:** Gwynn O'Gara <gwynn@gwynnogara.com>  
**Sent:** Saturday, September 12, 2015 10:18 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Free coastal access

Dear Mr. Lavine,

Please keep California coastal access free to all and urge your fellow commission members to do the same.

Free beach access is like free libraries and free schools. We learn so much and we need the healing of being by the sea. Ocean waters help to calm and center us. And having to pay may keep those who need it the most away.

Thank you,

Gwynn O'Gara

**Lavine, Ethan@Coastal**

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**From:** Jim Finn <fsgarden1@gmail.com>  
**Sent:** Saturday, September 12, 2015 6:56 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** iron rangers

Dear Mr. Lavine.

Please don't approve any iron rangers on the beaches in Sonoma County or any other county.

Thank you,

Jim Finn

**Lavine, Ethan@Coastal**

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**From:** karen <karenfahey@sbcglobal.net>  
**Sent:** Friday, September 11, 2015 11:48 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Keep Our Beaches Free

Dear Mr. Ethan Lavine,

Sonoma County wants to keep our beaches free. With a new proposal for a proposed fee structure of \$8 for a day-pass and up to \$3 an hour otherwise, plus fancier machines that allow payment via debit, credit, or even cell phone and “demand pricing” options, State Parks is once again attempting to collect. Ultimately, the 1976 Coastal Act states that access to our beaches is guaranteed, and parking fees may limit people’s access to our beautiful coastline. I understand the CA Coastal Commission will be taking up this issue and ask to please hold local hearings so our local and unique voices can be clearly heard in the process.

Sincerely,

Karen Antonioli-Fahey

**Lavine, Ethan@Coastal**

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**From:** reuben weinzveg <preserveruralsonomacounty@gmail.com>  
**Sent:** Friday, September 11, 2015 11:24 AM  
**To:** Reuben Weinzveg  
**Subject:** SAVE OUR COAST! Time sensitive Action Needed!



Photo of bucolic ranchland on Sonoma Coast by BIM

## **OUR COAST IS THREATENED**

Sonoma County Supervisors and the Permit Department are proposing dramatic changes to the Local Coastal Plan Agriculture elements that will pave the way for industrial winery/event center development in agricultural zoned areas of the Coast. This opens the Coastal Ag zoning up for a big push by winery industrial bottling and event center use, rather than preserving Ag as is the intent of the current General Plan. (Watch for coverage soon in the Press Democrat...we've been working with reporters there to get the word out)

With warming temperatures inland, the Coast is the new target for winery/event center development and planting of cooler temperature varieties such as Pinot and Chardonnay grapes. Much like the negative cumulative impacts that currently affect areas like the Dry Creek Valley and Valley of the Moon, our beloved Coastline is the next development target by Big Wine.

***THIS MEANS MORE TRAFFIC, SAFETY ISSUES, POLLUTION, RUINED VIEW SHED, WATER DEPLETION AND DEGRADED ENVIRONMENT***

***ONLY YOU CAN STOP THIS FROM HAPPENING***

Visit <http://preserveruralsonomacounty.org/coastal-issues/> to SAVE OUR COAST.

Write to those listed on our website under the Speak Up tab, and ask them to delete the proposed amendments dealing with marketing and promotion of agriculture and to **leave the current coastal protections in place**. See sample letters on our website and send with the indicated attachment. **Public comment period ends September 30, so please take action now! Please share with your local friends and neighbors as it will take a huge public outcry to stop this. Thank you for your help!**

## Neighbors to Preserve Rural Sonoma County (PRSC)

**We are a 100% volunteer organization. Please consider making a donation to help us advance our mission. Donations can be made by sending your tax deductible checks made out to Sonoma County Tomorrow (our fiscal sponsor), c/o PRSC, P. O. Box 983, Sebastopol, Ca. 95473. Or donating online via Paypal <http://preserveruralsonomacounty.org/donate/>**

Visit our website at - <http://www.preserveruralsonomacounty.org>  
Like us on Facebook - <https://www.facebook.com/preserveruralsonomacounty>

**Lavine, Ethan@Coastal**

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**From:** Clare Najarian <armen@sonic.net>  
**Sent:** Friday, September 11, 2015 8:52 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** state beaches

Mr. Lavine,

There is no reason that trumps not charging for beach access at the Sonoma County coast. What a travesty. I will NEVER pay \$8 to watch a sunset or take my grandchildren to the beach. The 1976 coastal act states that access to our beaches is GUARANTEED. What more do you need to make a decision. This is a direct slap in the face for families and those who struggle just to PAY basic bills. NO! NO! NO! NO CHARGES TO ENJOY LIFE AT THE COAST. Do your duty and save access to the coast for everyone.

Clare Najarian

**Lavine, Ethan@Coastal**

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**From:** Gwen Dhesi <gpdhesi@sonic.net>  
**Sent:** Friday, September 11, 2015 5:36 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Pay station installation

Do not charge people for use of the beaches. It is very important the human spirit have free access to the natural world. if you charge that limits who can afford to use the beaches, and for those who can use them to feel disinclined to do so.

Regards,  
Gwen Dhesi, Sonoma County



**Harold C. Appleton**

*Registered Professional Forester #1977*

*Certified Professional in Erosion and Sediment Control #271*

*P.O. box 1755 Bodega Bay, CA 94923*

*(707) 875-3976*

August 6, 2015

Ethan Levine, Coastal Analyst  
725 Front Street, Suite 300  
Santa Cruz, CA 95060-4508

Re: Iron Rangers

Lets not have more coastal parks inaccessible to low income families and the general public. The "iron ranger" idea is something we must avoid or we will loose support for both the Coastal Commission and legislators not to mention disenfranchising the general public from their rights to access public lands. We can work out alternative. Sonoma County is known for creative arrangements with non-profits to help manage and maintain State lands. Willow Creek and Land Paths for example. Stewards of the Redwoods and Goat Rock, Armstrong Woods and others. Of all the things my State Taxes should be paying for, coastal access rates very high on the list.

**Lavine, Ethan@Coastal**

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**From:** Iso Rabins <iso@foragesf.com>  
**Sent:** Wednesday, July 22, 2015 5:11 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Keep our beaches free

Mr. Lavine

I'm writing to express my concern over the proposal by the parks department to install pay stations at currently free beaches along Sonoma County Hwy 1. Given the already current lack of free public space along the coast, I think this policy is misguided to say the least. In addition to the issue of access, I believe that this proposal will cause congestion and danger alongside the highway as people attempt to avoid the pay stations, as well as endangering vulnerable ecosystems as people will create their own paths to the beach for the same reason. The board of supervisors voted unanimously against this proposal for good reason. Please respect the decision of the local leaders and reject this new fee on our coasts.

Thank you

Iso Rabins

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[www.forageSF.com](http://www.forageSF.com)  
[www.foragekitchen.com](http://www.foragekitchen.com)  
forageSF

## Lavine, Ethan@Coastal

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**From:** Joaniev <joaniev@aol.com>  
**Sent:** Friday, July 17, 2015 3:07 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Coast Access --Sonoma and Mendocino--impt.

Hello Ethan,

I'm a resident of Sonoma County and together with family and friends, I often go to the Sonoma and Mendocino coastal areas.

It is very important that you protect public access at these beaches by stopping the "Iron Rangers" and fees that are proposed.

Our area is proud of its beautiful coast and how it is accessible to any visitor.

It will hurt the areas if people have to look for alternative parking.

Also, people should be able to stop by for a short visit and picnic, without having to pay fees.

Self-pay devices at our beaches is a mistake. Please do not allow it.

Thank you.

Joan Voight

Healdsburg, CA 95448

7/8/15

DEAR,  
CA COASTAL COMMISSION  
NORTH CENTRAL COAST DISTRICT OFFICE

AS A CONCERNED SONOMA COUNTY RESIDENT  
AND CITIZEN WHO WANTS TO PROTECT OUR COAST  
I RESPECTFULLY

- ASK that the Sonoma Coast "Iron Rangers" program be dropped
- Request that the Coastal Commission force State Parks to negotiate with Sonoma County and local residents for a solution that works for everyone.
- Remind you that further parking issues, traffic and safety issues will occur if Iron Rangers are installed.
- Ask that you keep me informed as this issue evolves and future meetings are scheduled.

Thank you very much,

Lorraine Cook

P.O. Box 271

Gebastopol, CA 95473

**RECEIVED**

JUL 10 2015

CALIFORNIA  
COASTAL COMMISSION  
CENTRAL COAST AREA

June 27, 2015

Dear CA Coastal Commission  
attn Ethan Levine, Coast Analyst

We are old and live on social security.  
We often go to Goat Rock State beach  
to see the ocean and the seals and  
the birds.

If we had to pay for parking we  
would be unable to visit our beach.

Please do not put Iron Rangers in  
the parking areas at Goat Rock.

Sincerely,  
Rose Saint John  
Patrick Craig

 Ms. Rose Saint John  
19380 Pine Glade  
Guerneville, CA 95446



Mr. Patrick R. Craig  
19380 Pine Glade  
Guerneville, CA 95446-9046

**RECEIVED**

JUN 30 2015

CALIFORNIA  
COASTAL COMMISSION  
PUBLIC CORRESPONDENCE  
Exhibit 11  
Public Correspondence  
Page 157 of 476

Patricia Roerke  
1201 Parducci Rd.  
Ukiah, Ca. 95482  
June 1, 2015

Dear Ca. Coastal Commissioners,

This letter is in reference to the proposal by Ca. Parks + Recreation Dept to put "iron rangers", intended to collect money for access to and use of public beaches in Ca, specifically along the Sonoma Coast.

The Ca. Supreme Court has established the right of public access + use of our coastal beaches. This proposed move would make a day outing on the beach unaffordable for many Californians. I am a retired person, trying to live on \$800. a month. There are millions of people + families like myself, struggling to subsist on a sub-minimal income - or families + single mothers subsisting on minimum wage jobs. For folks, like us (there are millions of us) every penny counts. This act would make a walk on the beach unaffordable for us.

The most serious issue here is that it indirectly turns our beaches and wildernesses into commodities. Increasingly, the beaches will become enclaves for the wealthy + privileged. Part of our heritage as Americans has

always been free and open access to our beautiful  
coasts and public lands for every American.

God created the Earth for all people. This would  
be a shameful violation of natural law and our  
American heritage.

Although I believe funds have been mismanaged,  
if there is a shortfall of funds, it should come from our  
States. Why not post a sign, explaining the need for  
money, suggest people donate on a sliding scale  
based on income? Or perhaps there could be free passes  
for elders, disabled + persons below a certain income  
level?

These are a couple of alternatives that would ensure  
that all Americans continue to have their legal  
right to walk on God's Earth sustained.

Thank you!

Sincerely yours,

Patricia Bourke

## Lavine, Ethan@Coastal

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**From:** Rhody Mashek <r.mashek@gmail.com>  
**Sent:** Monday, May 18, 2015 12:26 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** requesting information about iron rangers sonoma county

I would like to know how this plan to charge eight dollars for parking to me and my low income, surfing, friends is going to benefit our community. honestly I am outraged. I believe this plan will lead to unsafe conditions for those that can not afford to pay eight dollars every day. Goat rock is the place that I surf, and knowing the other people that surf there i can safely assume that the only thing these iron rangers will do is make a small group of people walk a long distance across a dangerous highway. eight dollars is a lot of money.. it is not worth endangering the lives of my friends or mine. this is not southern california, we can not skip to the beach and leave the cars at home. please find another way. There is a large blind turn just before goat rock after a turnout. that is where someone will be hit by a car if this plan is implemented. please take this into consideration

## Lavine, Ethan@Coastal

---

**From:** Jay de Long <jay@dminetworking.com>  
**Sent:** Monday, May 04, 2015 10:42 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** proposed sonoma coast fee

Hello Mr. Lavine,

I am writing to express my most genuine outrage at the proposed coastal access fees.

I am a native of Sonoma county and have surfed and dived this coastline for 30 of my 43 years. My family and I have paid taxes, fishing fees, day use fees when necessary, but I cannot stomach the idea of more fees for coastal access and a virtual lock-down.

Access of our beautiful treasure of a coastline should not be restricted because of fees. It is one of the most important resources we have in Sonoma county and one that needs to be available for free to all residents and visitors. We must be wise with this responsibility and not treat it as a meal ticket for our poor/or otherwise financial management.

I am absolutely floored that this is the thinking of our current representation. To commoditize this local treasure represents a most egregious disconnect and an should never be considered.

Thank you for listening and supporting the community by supporting free access to Sonoma County beaches.

Jay deLong

## Lavine, Ethan@Coastal

---

**From:** zeke cissell <surfbird789@yahoo.com>  
**Sent:** Friday, May 01, 2015 4:29 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FREE OUR BEACHES

Hello,

I am writing to you to express my opposition of the iron rangers along our coast. I am an avid surfer and free diver and frequent the sonoma coast anywhere from 2-5 times weekly.

I support the county and state parks and for years have bought annual parking passes. As far as paying \$8 a day for parking along our beaches I am not in support of that.

How are any of us that surf or dive all year a few times a week going to be able to afford that. At 2 visits a week averaging 2 hours per visit. That will cost me \$832 a year or \$4 dollars an hour to surf. There has got to be a better way. How are our kids going to be able to enjoy our coast if we can't afford to park?

**Zeke Cissell**

Sonoma County Resident

**Lavine, Ethan@Coastal**

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**From:** Laurel Laws <urmysunshine8213@gmail.com>  
**Sent:** Friday, May 01, 2015 4:18 PM  
**To:** Lavine, Ethan@Coastal

I'm not ok with the fees. Seems like the small coastal communities benefit from the influx of tourists Because our beaches don't have fees... I know lots of people that avoid the existing ones because of their fees. And these are people that can afford the additional expense. That says volumes to me. If people aren't willing to come because they have to pay, what do you think is going to happen to the little local economies?!? Not only that I've seen plenty of people dodge the fees at current locations. What about the locals? We would have to pay to play in our own backyard?!? Seems silly.

Sincerely,

Against fees being enforced

## Lavine, Ethan@Coastal

---

**From:** dontsellmycoast@aol.com  
**Sent:** Friday, May 01, 2015 6:50 PM  
**To:** ethan.lavine@coastal.ca.gov.  
**Subject:** Sonoma Coast Beach Fees

To: Commission Planner Mr Ethan Lavine

As a 5th generation Sonoma County resident and a life long visitor to the Sonoma Coast and I'm going to give you my predictions for what will happen if you install self pay stations at the few remaining free beaches here in Sonoma County as well as tell you my opinion on why doing so could be a very bad and potentially costly idea.

1) The first reason is parking. Many of the location to be converted to pay lots have alternative parking. Bodega Head and Campbell Cove have the access road shoulder parking. Bean Ave. has the surrounding neighborhood and access road shoulder. Salmon Creek has all the road side shoulder parking from the Ranger Station at Salmon Creek to the north end of Salmon Creek Beach. School House beach has the surrounding neighborhoods. Portuguese Beach has the surrounding neighborhoods. Goat Rock and Blinds Beach have all the access road shoulder parking. Russian Gulch has roadside parking. Stump Beach has road side parking. Now with all this alternative parking any idiot is going to be able to tell what will result from these facts.

A) The first result will be that people are going to use the free alternative parking first. People will be finding and using all this alternative parking FIRST while the pay lots will sit empty. This will result in more people clogging up the road side shoulders, making crazy u-turns, parking in the neighborhoods and in front of peoples houses and causing more and more traffic problems as people hunt for these free spaces along the roadsides. The local residents are going to be calling the sheriffs or calling the state parks and complaining and this is going to result in a distraction for law enforcement who's time would be better spend dealing with more important matters than parking. And all this friction and problems resulting from these parking issues will have only one foreseeable result.

B) The result will be the state needing to installing no parking signs and guardrails on the shoulders of all these now "problem" areas like has already started to happen in places like Bean Ave. where people have had to park on the roadside due to the Parks Department blocking off access. These neighborhoods and other free places have been used for decades as parking (especially on the extremely crowded days) and this overflow parking has most likely been tolerated because it rarely gets that crowded. But with these pay stations installed every day will be like a crowded day for the people unfortunate enough to live in these overflow parking areas. This inevitable placing of no parking signs and guard rails will only result in LESS parking for the public in the end. I foresee many more guard rails and no parking signs being installed due to this attempt to make money from the public. And this newly created LOSS of parking will result in a need for newly created parking areas. That means more construction and more money spent when it could have been saved.

2) The second reason is vandalism. I have already heard talk around the camp fires about how some people will be willing to vandalize any of these new pay box's once they are installed. Have you considered the cost of each of these pay stations and what it will take to keep them working if they are constantly vandalized? This could be a potential money pit of endless maintenance or complete re-installment in order to keep theses pay boxes operational. Don't think for one second that these boxes will just go up and everything will run smoothly because I'm betting this will not happen. There WILL be vandalism and what will you do then and where will you get the money to continually fix things? Our coastal access locations are sparsely policed and in many cases hidden from plan sight and there will be plenty of time for those who are so inclined to do the damage needed to make these pay station unless. This prediction is pretty much guaranteed and again the end result will be that you are loosing money not making it.

Pay boxes = blocked access plain and simple. The people within the State Parks System need to stop bending to the pressure of the State. Let the politicians find the money they need elsewhere. The State Parks has one mission and that is to protect and keep open the publics open spaces. Not to constantly "improve" them, not to provide services for everyone, not to make trails and boardwalks, not to provide employment or to create job security for it's employees... the State Parks Mission is to PROTECT AND KEEP OPEN OUR OPEN SPACES!!! It's not to generate money. A money generator was not John Muir's idea and it was not the idea when our State Parks were formed. Having to close any park is a failure and an apparent utter lack of understanding of this mission. Not lessening your spending in times of need is a failure. Not laying off employees is a failure. More money is not whats needed, a re-evaluation of priorities is what's needed.

A2-SON-13-0219

Exhibit 11

Public Correspondence

Page 164 of 476

From: One of the people who you work for who opposes any and all park fees.

Listen to the people.  
Do what is right.

## Lavine, Ethan@Coastal

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**From:** Jacob Rich <jerichsalud@hotmail.com>  
**Sent:** Thursday, April 30, 2015 4:02 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Sonoma County State Park Beach Access

Hello Mr Lavine,

As a regular user of the Sonoma Coast I really hope that you and the California Coastal Commission consider seriously the State Parks plan.

I am happy to "put my money where my mouth is" for parks and I do so in many ways. I happily support the County's Regional Parks, I have a year long pass and would willingly do so for State beaches as well. That said my concern is that the plan as it is now would be discouraging for regular users to pay a daily fee of \$8 or for a yearly pass of \$195. The Regional parks yearly pass is \$69, a much more realistic charge.

I hope we can find a middle ground as I am willing to support the parks but at a reasonable rate.

Thank you for considering this,

Jacob Rich, MPH

Zip-95472

## Lavine, Ethan@Coastal

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**From:** Phil Warren <phil@jeanwarren.com>  
**Sent:** Thursday, April 30, 2015 4:33 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Coastal Access user fees

Dear Mr. Lavine:

Here is the text of an e-mail we sent to my local Councilman and to the California State Parks Association. We understand the passions expressed by people who do not want to make financial contributions to the accessibility and safety of our coastal resources, but we firmly believe the users of these facilities need to contribute part of the costs. We've elected to stop our membership (contribution) to the State Parks Association until all users start to contribute to the benefit of our coastal resources.

*Mr. Efren Carrillo, Supervisor  
County of Sonoma*

*We have been Bodega Bay residents for the past 8 years. We have enjoyed the use of the California State Parks along our Sonoma Coast and have, for many years, maintained a membership in the State Park System even though we don't use any of the 'for fee' portions of the Parks along the Sonoma Coast.*

*We are advocates of making all of the State Parks available to everyone and would be supportive of measures like a vehicle based fee collected by DMV that would allow cars with California tags free admission to the Parks. We would be supportive of a broad based additional tax collected by the State to help fund State Parks. We are not supportive of the current practice of closing segments of the Sonoma Coast State Beach because of limited funding (parts of Badega Head, Campbell Cove, South Salmon Creek Beach, Russian Gulch, and other areas are cordoned off to prevent access). Other inland State Parks in Sonoma County are closed or have been adopted by non-profit groups to allow access. But we understand that it is impossible for State Parks to assure the viability and safety of some portions of the parks with the limited availability of funding.*

*We do not support the concept that everyone should have access to the State Parks for free. The current controversy over the installation of 'iron rangers' seems to be based on the concept that everyone has a right to free access to the parks and we don't see any adults standing up and saying that people who use the parks should be willing to offset at least some of the costs (rangers, lifeguards, sanitation, parking lots, trails, etc). This year, we elected to terminate our membership in California State Parks. When others step up to the plate and start paying some portion of the costs, then we'll reinstitute our membership in California State Parks.*

*We urge you to develop and support a solution that provides adequate funding for State Parks and asks users to pay at least a portion of the costs.*

*Philip & Jean Warren  
P.O. Box 696  
Bodega Bay, CA 94923  
707-875-9240  
[phil@jeanwarren.com](mailto:phil@jeanwarren.com)*

Linda Jupiter  
P.O. Box 2822  
Fort Bragg, CA 95437

April 27, 2015

California Coastal Commission  
45 Fremont Street, Suite 200  
San Francisco, CA 94105

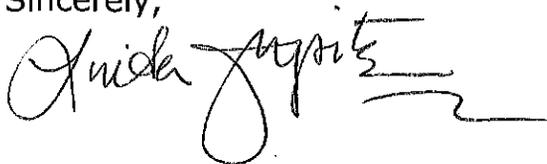
Dear Commissioners:

This letter is in reference to the proposal by California Parks and Recreation Department to put "iron rangers" into place to collect money for access to and use of public beaches in California, specifically, Sonoma County.

The California Supreme Court cases of *Dietz v. King* and *Gion v. City of Santa Cruz* clearly established the right of public access and use of our coastal beaches to its citizens. *Dietz v. King* involved a landowner charging money for access to a public beach. There is no meaningful distinction between an access charge by State Parks or by a private landowner. Although the state is trying to raise money from a multitude of sources, denying the public free access to *our* beaches seems a clear manifestation of class warfare. One of the few things a lower income family can do that does not cost money is to spend a day at the seashore.

The California Coastal Commission was created by popular vote to ensure public access to the beaches and to protect those rights, whether from private landowners or public agencies. Particularly in this case where Parks and Recreation has proved itself to be capable of massive budget mismanagement and the concealing of funds, the idea that this organization should deny the public free access to beaches, which are supported by our tax dollars, is unconscionable.

Sincerely,

A handwritten signature in cursive script that reads "Linda Jupiter". The signature is written in black ink and includes a long horizontal flourish at the end.

California Coastal Commission  
45 Fremont Street  
Suite 200  
San Francisco, Ca.  
94105

Dear Commissioner

This letter is in reference to the proposal by Calif Parks and Recreation Department to put "ironrangers" intended to collect money for access to and use of public beaches in California. The California Supreme Court case of Ditz v. King and King v. City of Santa Cruz established the right of public access and use of our coastal beaches. The former case involved a landowner charging for access to a public beach. There is no distinction between an access charge by state park as opposed to a private landowner. Denying the public free access to our beaches seems a manifestation of class warfare. One of the few things a lower income family can do that does not cost money is to spend time at the sea shore. The Calif Coastal Commission was created by popular vote to insure public access to the beaches and to protect these rights, whether from private land owners or public agencies. The idea that this organization should deny the public free access to beaches which are supported by our tax dollars is unconscionable. Sincerely

ms Dobby Sommer,  
my children & grandchildren

POB 568  
Albion Ca.  
95412

Albion, California  
4/25/15

to:

Coastal Commission,

We are very much opposed to the proposal to charge \$\$\$ for our right to enjoy our PUBLIC beaches at any time, now or in the future or ever.

OUR beaches are not for rent at all, period.

And to those who are proposing this charge may I remind you that OUR Country is a FREE country whos many millions of our young U.S. citizens have died in their attempt to keep our country including our beaches free for our enjoyment without government intrusion.

GARY TOMAS MORALE Thompson  
Viet Nam Vet SP/5 US 56822938  
(US ARMY)

P.O. Box 301  
ALBION, CA 95410

**Lavine, Ethan@Coastal**

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**From:** lolo thev <lolowonderful@gmail.com>  
**Sent:** Friday, April 24, 2015 8:52 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Paying for Beach Access

I am a disabled Sonoma County Transit. I take public transportation in the summer to access the Bodega Headlands. I am no longer driving due to vehicle accident. Would the fee apply to those using public transportation in the beach areas mentioned in the Bohemian article?

Sincerely,  
Loreen Theveny

(707) 843-6206

**Lavine, Ethan@Coastal**

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**From:** Sandy Horowitz <sanfordhorowitz@gmail.com>  
**Sent:** Friday, April 24, 2015 5:05 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Beach Fees

Very against. Very bad idea to make everything commercial and discourage people from the great outdoors.

Sanford Horowitz Esq.

PETER WHITE

PO BOX 111  
MISSION CA 95410

RECEIVED  
APR 23 2015  
CALIFORNIA  
COASTAL COMMISSION

CALIFORNIA COASTAL COMMISSION  
45 FREMONT STREET SUITE 200 S  
SAN FRANCISCO CA 94105

4-21-15

DEAR COASTAL COMMISSION/COMMISSIONERS:

PLEASE DO NOT PERMIT "IRON  
RANGER" FEE AND CHARGED ACCESS  
TO PUBLIC BEACHES. THIS FLIES IN  
THE FACE OF REASON, PERPETUATES  
CLASSISM AND, ESSENTIALLY, CONTINUES TO  
STEAL FROM THE POOR & GREATER PUBLIC,  
REQUIRING DOUBLE PAYMENT FOR WHAT  
IS ALREADY OWNED BY THE PUBLIC. THIS DOES  
NOT BEGIN TO ADDRESS THE STATE'S HANDING  
TO PRIVATE, FOR PROFIT SO-CALLED "VENDORS"  
LIKE BANK OF AMERICA AND VARIOUS  
BOUGHT-OFF LEGISLATORS LOADING THE  
PUBLIC TREASURY AND TAX, -THE PEOPLE'S  
FUNDS.

THANK YOU FOR YOUR PROMPT, CAREFUL  
ATTENTION  
PETER WHITE

4-21-15

Peter D. Lit & Darcie Mahoney  
30995 Greenwood Road  
Elk, CA 95432

RECEIVED  
APR 23 2015  
CALIFORNIA  
COASTAL COMMISSION

20 April 2015

California Coastal Commission  
45 Fremont Street, Suite 200  
San Francisco, CA 94105

Dear Commissioners:

This letter is in reference to the proposal by California Parks and Recreation Department to put "iron rangers" intended to collect money for access to and use of public beaches in California, specifically, in our understanding, Sonoma County.

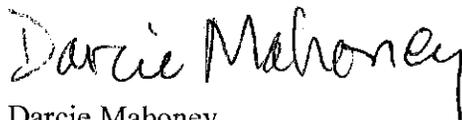
The California Supreme Court cases of Dietz v. King and Gion v. City of Santa Cruz clearly established the right of public access and use of our coastal beaches. The former case involved a landowner charging money for access to a public beach. We are unable to see a meaningful distinction between an access charge by State Parks as opposed to a private landowner. Although the State is trying to raise money from a multitude of sources, denying the public free access to OUR beaches seems a clear manifestation of class warfare. One of the few things a lower income family can do that does not cost money is to spend a day at the seashore.

The California Coastal Commission was created by popular vote to insure public access to the beaches and to protect those rights, whether from private landowners or public agencies. Particularly in this case where Parks and Recreation has proved itself to be capable of massive budget mismanagement and the concealing of funds, the idea that this organization should deny the public free access to beaches which are supported by our tax dollars is unconscionable.

Sincerely,



Peter D. Lit



Darcie Mahoney

**Lavine, Ethan@Coastal**

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**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:37 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: Dave Hardy Response to State Parks comments of April 13

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**From:** Dave Hardy [riocojo@gmail.com]  
**Sent:** Wednesday, April 15, 2015 1:33 AM  
**To:** SonomaStateParksAppeal@Coastal  
**Subject:** Dave Hardy Response to State Parks comments of April 13

To: The California Coastal Commission

From: David Hardy, Monte Rio, CA

Date: April 14, 2015

RE: CCC File # A-2-SON-13-0219

Agenda Item No. W17a

Dear Commissioners,

I am in receipt of the April 13, 2015, request by Liz McQuirk, State Parks Deputy Director for Legislation, and I have the following comments.

First of all, it's just bad governance to use a single permit to attempt to re-write a policy document. Good governance suggests that the policies in the Sonoma County LCP be dealt with first in the deliberative LCP update process currently underway. State Parks keeps citing its legislative mandate. Unfortunately, the Legislature appears to have failed to consider the ramifications of the Coastal Act in its budget deliberations. The Legislature could have clarified certain elements of the Coastal Act and acknowledged that Coastal parks are not the same as those on lakes, in the mountains, or in the valleys. But they didn't.

Ms. McQuirk's statement that "The precedential value of allowing a local entity to effect a legislative mandate regarding state management of lands has broad implications of statewide concern..." indicates to me a disturbing disregard for the Legislative intent of the role of local governments in state Coastal Planning. Is she suggesting that local governments be cut out of the coastal planning process when the subject involves State Parks or Caltrans? If so, that is suggesting a wholesale re-write of and philosophical approach to the Coastal Act.

The Legislature intended that local governments have a crucial role in Coastal Planning; that's why local agencies have the primary role of administering the Coastal Act, subject to the oversight and review of the Commission. It's why the primary planning document is called a *Local* Coastal Plan, and why it is not effective until the Coastal Commission certifies it.

If Sonoma County has effected a legislative mandate, it's because it has fulfilled its mandate to administer the Local Coastal Plan as certified by the Coastal Commission.

State Parks is entitled to its opinion, but it is not authorized to administer and interpret the act in lieu of the authorized permitting agencies. State Parks and Caltrans may find it inconvenient to have to deal with a seemingly subordinate local agency, but that was the Legislature's intent and that has been the practice for years.

As to interpretation of the meaning of the words "No change" with respect to access at various locations, State Parks says the County "imposed a new condition in its LCP that was not intended" and that those words were "simply recognition and grandfathering in of existing services and access points." That's their opinion, and a rather audacious putting of words in the mouth of the County.

In the 1994 Surfrider case, the court acknowledged that impediments to access may be non-physical. Thus a change from free to fee use constitutes a change. The LCP says "no change." As I recall the Board of Supervisors' hearing on the matter, State Parks did not raise this issue at the time. The Board determined that "No change" means what it says: "No change." That's how the Board interpreted its guiding policy document and applied it to a proposed permit and set of facts.

So why does State Parks now contest the meaning of "No"?

If a lady says "No!" to a gentleman's advances, a gentleman retreats graciously, apologizes, and doesn't argue that "No" means "Yes" or "Maybe."

#### PROPOSED ACTION AND CONDITIONS OF APPROVAL

State Parks is asking you to act in haste and repent at leisure. Should you find that there is a substantial issue, you should avoid the immediate de novo hearing because the public has had little time to absorb the revised project description or the proposed conditions of approval.

State Parks is asking for an automatic rollover of the permit after a 3-year period. Please reject this. The entire matter should be reconsidered in three years, period, without giving them a carte blanche of infinite rollovers and forcing the Commission—not the County—to bring a revocation action. Besides the State budget picture could remain healthy and the budgeting process is always subject to revision. And the County could have a new LCP.

State Parks wants to freely assign the permit to "any person." Who's that? Donald Trump? This is a significant matter. It is the camel's nose under the tent for rampant and potentially unregulated commercialization. This condition may seem standard, but the ramifications of this demand exemplify why the Commission should not act de novo on this permit at this time.

State Parks considers the Peak Period to be from March 1 to November 31. That's eight months of the year. Not a peak period, but most of the time.

State Parks suggests that temperature will be a consideration in the automated rate setting. The temperature where? In Bodega Bay, or in Stockton and Sacramento?

State Parks proposes a flexible pricing scheme, suggesting that some days could be at no charge. When one leaves home, how much money should be in the wallet?

State Parks mentions that they offer passes. However there are numerous asterisks attached to the pricing schemes on those passes. If the Commission acts today, I suggest a condition that local passes, without asterisks, be made available at the automated kiosk and that the cost not exceed the cost of the County's Regional Parks passes.

Regarding questions of intent or interpretation, State Parks proposes that the discussions are limited to the Commission's Executive Director and State Parks. Such questions should also include the County as well.

## FINDINGS

State Parks' proposed findings are laden with wishful thinking and short of evidence for the record. That State Parks "is willing to work with" Sonoma County is not a verifiable statement of fact but rather a vague holding out of hope.

## CONCLUSION

Again, I urge you to find that no Substantial Issue exists in this appeal. Please reject the appeal and remand the revised project description to the County for review in context of the current LCP update process. There is some middle ground that can be achieved, but that will not happen if the Commission accedes to State Parks audacious last minute requests.

Again, I remind you that the California Constitution requires the Legislature to give "the most liberal construction" to the citizens' right and ability to access the coast, and the Coastal Act provides that the Constitution shall be implemented to provide "maximum access." Limitations on providing that maximum access are related to physical constraints, not fiscal constraints. Please fulfill your Constitution and Legislative directive and reject the requests of State Parks at this time.

Thank you for your consideration.

Dave Hardy

Monte Rio, CA

**Lavine, Ethan@Coastal**

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**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:37 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: Days use charges

---

**From:** Ken Bowles-Vista Enterprises [kenvue@comcast.net]  
**Sent:** Wednesday, April 15, 2015 4:26 PM  
**To:** SonomaStateParksAppeal@Coastal  
**Subject:** Days use charges

I disagree with any plan to charge visitors to Sonoma County beaches. The coast is for everybody-don't leave out poor people who are limited in recreation activities as it is. I pay taxes for state parks and Sonoma County residents aren't merely a source of revenue for government.

Ken Bowles  
Sonoma

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**Ken Bowles**  
**Vista Enterprises**  
**257 Manuella Lane**  
**Sonoma CA 95476**  
**707 266 8117**

April 20, 2015

RECEIVED  
APR 23 2015  
CALIFORNIA  
COASTAL COMMISSION

California Coastal Commission  
45 Fremont Street, Suite 200  
San Francisco, CA 94105

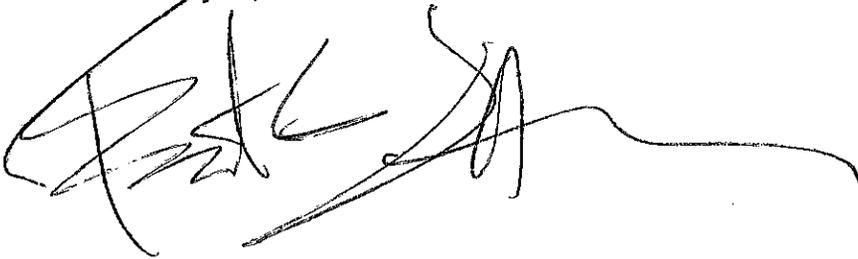
Dear CCC,

Please let this letter serve as my request that the members of the California Coastal Commission reconsider your position calling for cash payment to visit our coastal beaches. The taxpayers of California and those who visit our shoreline from around the world will truly be indignant at the prospect of having to pay to visit the coast.

Those of us who live in California are still wondering where the missing \$53 million State Parks money went. Those who travel to California from elsewhere will simply feel unwelcome when asked to pay to see the coast.

Our tourism economy is dependent on visitors' positive experiences and the goodwill we can extend to our guests who have elected to visit coastal California. Please don't drive them away by asking for more money.

Thank you,



Robert G. Jetton  
P.O. Box 1701  
Mendocino, CA 95460

(707) 734-0417

## Lavine, Ethan@Coastal

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**From:** Gregory Fearon <gfearon@gmail.com>  
**Sent:** Friday, April 17, 2015 2:34 PM  
**To:** Coleman, Stephanie@Parks; Coleman, Stephanie@Parks; Jones, Dana@Parks; Jones, Derek@Parks; Lavine, Ethan@Coastal; Carl, Dan@Coastal; Una Glass; Cea Higgins; Michele Luna; Dean Parsons; Tennis.Wick@sonoma-county.org; Mike Reilly; Mark Massara  
**Subject:** California Coastal Views

Greetings!

As I said in my testimony before the Commission this week, as someone involved in three community-based organizations who partner with State Parks to bring resources and energy to the Sonoma Coastal visitor experience, I am eager to further discussions to move this project and issue forward over the next few months. I will be utilizing my Google Blog (California Coastal Views), to explore the ideas which surface, and share our efforts to forge solutions which bring us together.

I welcome your participation, and will do my best to help all of us pursue solutions which serve the needs of Californians and those who love its coast.

Gregory Fearon  
[gfearon@sonic.net](mailto:gfearon@sonic.net)  
[gfearon@gmail.com](mailto:gfearon@gmail.com)  
<http://califcoastalviews.blogspot.com/>

**Lavine, Ethan@Coastal**

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**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:37 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: Beach parking fees

---

**From:** kevinmiley@charter.net [kevinmiley@charter.net]  
**Sent:** Wednesday, April 15, 2015 4:59 PM  
**To:** SonomaStateParksAppeal@Coastal  
**Subject:** Beach parking fees

Coming to your coastal beaches from Nevada, 2 or 3 times a year, we are dismayed to find out your state wants to start charging fees to park at the beaches we love to go to. Since we do help with your taxes from purchases of gas, food, lodging and merchandise, we feel we do enough to enjoy the beaches. Also, has anyone considered the fact that these beaches are probably the last places to go to enjoy life and have some fun without having to pay yet another government fee? Thank you, Kevin and Linda Miley--Sparks, Nv.

## Lavine, Ethan@Coastal

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**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:37 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: Iron gates a very bad idea!

---

**From:** Brian Whistler [brian\_whistler@comcast.net]  
**Sent:** Wednesday, April 15, 2015 7:04 PM  
**To:** SonomaStateParksAppeal@Coastal  
**Subject:** Iron gates a very bad idea!

Hello,

As a 40 year resident of Sonoma county, I have always been proud of the fact that our coasts are free-our beaches are a commons in which all people no matter how low income, can have a restorative day in the sand and foam.

I pay my taxes, and boy do I pay! and I always figured at least the beach was free. Now I understand you folks want to sully west county's reputation for free access to our coasts by placing no less than 14 iron pay gates along our beaches. Why?! Is our budget for parks and rec suffering so much that we can't maintain free access to our beaches? To me, this is incredible. And it will hurt some people for whom a day at the beach is about the only activity they can afford. I think it will hurt the county. If implemented, I for one will seek out free places to park and will walk to the areas I intend hang out. I find it unbelievable that we even have to have this discussion, that this issue is even up for debate: Please leave our beaches free and open to all!

I also understand that if implemented, the revenue isn't slated exclusively to repair access points and keep up the beaches, but that it goes into a "general fund." How do we even know where that money goes and what it gets used for? We don't.

A bad idea on all counts.

Brian Whistler

**Lavine, Ethan@Coastal**

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**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:36 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: charge at coastal parks

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**From:** Thomas Freund [freund@mcn.org]  
**Sent:** Thursday, April 16, 2015 1:29 AM  
**To:** SonomaStateParksAppeal@Coastal  
**Subject:** charge at coastal parks

please reject any charge for use of sonoma coastal parks. a request for donation is ok however.  
thomas freund 45621 cypress dr, mendocino, ca

**Lavine, Ethan@Coastal**

---

**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:36 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: Politely, thanks but no thanks on fees for beach access.

---

From: Peter White [best@mcn.org]  
Sent: Thursday, April 16, 2015 1:44 AM  
To: SonomaStateParksAppeal@Coastal  
Subject: Politely, thanks but no thanks on fees for beach access.

Politely, thanks but no thanks on fees for beach access.

We own 'em already; and if more money is needed, ask Bank Of America Et Al; THAT'S where the state's and peoples' monies are going; disappearing, rather.

--

Gratefully yours; all happiness, well-being and prosperity.

Peter White  
Real Estate Broker  
707-YES-BEST (707-937-2378)  
best@mcn.org  
Post Office Box 111  
32170 Albion Ridge Gaea North  
Albion California 95410  
bestres.com

**Lavine, Ethan@Coastal**

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**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:36 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: Against charging for beach access

---

**From:** Sharon Paltin, M..D [shsharealike@saber.net]  
**Sent:** Thursday, April 16, 2015 3:09 AM  
**To:** SonomaStateParksAppeal@Coastal  
**Subject:** Against charging for beach access

Dear State Parks staff,

I am a former Calif State Park Ranger Trainee (Marin Area) from 1978 or so, now a Family Physician in Laytonville, CA. The State beaches must be accessible to families and people of all incomes; they're our precious places and must stay free.

Thank you for your kind attention,  
Sharon Paltin, M.D.

**Lavine, Ethan@Coastal**

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**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:35 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: Charging for beach access

---

From: Dave Gealey [dgealey@mcn.org]  
Sent: Thursday, April 16, 2015 5:28 AM  
To: SonomaStateParksAppeal@Coastal  
Subject: Charging for beach access

I would like to strongly urge you to deny this State Parks proposal. Restricting access to only people who can pay will reduce the number of Californians who can use beaches, which are a public resource. I would suggest that funding for improvements be found elsewhere, perhaps as part of the DMV renewal fee dedicated to State Parks and not transferable to other purposes, which had occurred previously.

Dave

**Lavine, Ethan@Coastal**

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**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:35 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: proposed fee

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**From:** Sakina Bush [sakina@mcn.org]  
**Sent:** Thursday, April 16, 2015 8:24 AM  
**To:** SonomaStateParksAppeal@Coastal  
**Subject:** proposed fee

It has come to my attention that there is a proposal to charge a fee of \$8.00 to access beaches along the Sonoma County coast. I hope the Coastal Commission will refute this action. These beaches should remain fully accessible to the public and not just to those with affluence. \$8.00 may not seem like much to those who have it but it is an unreasonable amount for those with limited incomes. It is wrong to limit access to public beaches or to create a system where access is based on wealth.

Thank you,

Sakina Bush  
Fort Bragg CA

**Lavine, Ethan@Coastal**

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**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:35 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: fees charged to visit state and national lands

---

**From:** janet schlihs [janetschlihs@yahoo.com]  
**Sent:** Thursday, April 16, 2015 2:32 PM  
**To:** SonomaStateParksAppeal@Coastal  
**Subject:** fees charged to visit state and national lands

as a child i went camping all across the western united states with my family. there was NEVER a charge and there NEVER should be. these lands belong to you and me.

janet schlihs

**Lavine, Ethan@Coastal**

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**From:** SonomaStateParksAppeal@Coastal  
**Sent:** Thursday, April 16, 2015 10:35 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** FW: comment on proposed beach access fees

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From: Jim Heid [jim@heidsite.com]  
Sent: Thursday, April 16, 2015 5:06 PM  
To: SonomaStateParksAppeal@Coastal  
Subject: comment on proposed beach access fees

To whom it may concern:

As a 25-year resident of the Mendocino coast, I'm writing to respectfully urge the Coastal Commission to reject State Parks' proposal to charge access fees for Sonoma County beaches.

While I understand and respect the fact that State Parks needs funding to maintain its facilities, charging the public to simply park near and access a beach is the wrong way to go about it.

Here in Mendocino County, many of our beaches are used by locals as brief respites during their busy days. I and many people I know frequently stop at the beach for a quick walk and recharge when we're out and about running errands. It's inappropriate to charge someone \$8 -- or, for that matter, any amount -- to take a 20-minute walk and briefly escape the pressures of the day.

Many of the locals who use our beaches don't have a lot of discretionary income. Imposing beach-access fees is discriminatory and unfair. It shouldn't cost as much to access nature for 20 minutes as it does to go to a movie theater for three hours. Indeed, it shouldn't cost anything beyond what we already pay in taxes.

State Parks definitely deserves financial support. But imposing access fees is not the way to do it.

Again, I respectfully urge that the Coastal Commission deny State Parks' desire to charge beach fees.

Sincerely,  
Jim Heid  
PO Box 743  
Albion, CA 95410  
707-937-1747

**Lavine, Ethan@Coastal**

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**From:** Madrone <madrone@bftb.net>  
**Sent:** Wednesday, April 15, 2015 3:26 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** State Park entry fees

Dear Coastal Commission:

People need coastal access more than ever. Low income people are at severe risk of increasing isolation, frustration, and poverty. All ages are renewed by nature. To shut it off to just those who can afford it, will deny access to the ones who most need it.

Please honor the Sonoma County BOS and the general public when they voiced disapproval to installing iron rangers and additional fees for access to the coast. Your mandate is to facilitate the public to reach the coast and ocean, not to allow impediments. We are not asking for more facilities to be constructed, just the continued free and easy ways to enjoy our heritage. These are our precious natural assets which should not only be protected but available to all. You are our voice, not the voice of the powerful and privileged.

Thank you, Sherry Sloat Madrone 300 Kalinda Road, Cazadero 95421

**Lavine, Ethan@Coastal**

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**From:** Janet Greene <granite@sonic.net>  
**Sent:** Wednesday, April 15, 2015 9:47 AM  
**To:** Lavine, Ethan@Coastal  
**Subject:** beach fees

Dear Ethan,

I am opposed to charging fees for beach access. There are so many low income individuals and families that cannot afford this fee. They are already having to pay for gasoline, since there is no public transportation to these beaches for much of the year. I am a teacher in the Roseland district and know many low income families. Please keep open and free access to our beaches.

Thank you,  
Janet

CA Coastal Commission  
No Central Coast District Office  
45 Fremont St #2000  
San Francisco CA 94105-2219

RECEIVED

APR 15 2015

CALIFORNIA  
COASTAL COMMISSION

Dear Chair Kinsey and Commissioners:

Re: **A-2-SON-13-0219**

I urge you to deny the appeal of State Parks of the unanimous decision by Sonoma County Supervisors to deny installation of signs and self-pay fee collection devices "Iron Rangers" at 14 locations at the Sonoma County coast - Salt Point State Park and Sonoma Coast State Park.

The citizens of Sonoma County fought for coastal access for all in the 1970s and will do so again.

This is not the answer to State Parks' financial challenges. It is demoralizing to ride into a park and cannot get out and take a walk because I do not have money for parking. Parking on Route 1 is illegal and dangerous.

The Sonoma Coast has beaches below eroding cliffs. Installing Iron Rangers will dangerously push people onto Route 1, where there are limited shoulders and into our narrow neighborhood streets with soft shoulders. More people will climb down cliffs to get to the beaches, negatively impacting the coastal bluffs. People get hurt as they try to avoid paying, adding to our already overburdened local emergency services. Gravel lots make achieving access for mobility challenged visitors impractical if not impossible. Iron Rangers inordinately burden Environmental Justice Communities of Concern.

The Coastal Act was passed and the Coastal Commission was and is charged with ensuring public access to our coast - the public commons.

Please rise to the occasion of your charge, deny the appeal and retain free public access to our Sonoma coast.

Sincerely,

*Melinda Pahl*

*PO Box 1112*

*21051 Heron Dr.*

*Bodega Bay CA 94923*



**SIERRA  
CLUB**  
FOUNDED 1892

**Sierra Club, Mendocino Group  
Coastal Committee  
27401 Albion Ridge Rd.  
Albion, CA 95410**

April 14, 2015

Coastal Commission  
North Coast District Office  
710 E Street, Suite 200  
Eureka, CA 95501

Re: Proposal for paid parking at State Beaches

Dear Commissioners,

The Mendocino Group of the Sierra Club is very concerned with the proposal to increase the use of paid parking at the State Park-owned beaches along the Sonoma and Mendocino Coast. We believe that the access to the beaches will be constrained, in opposition to the mandated "maximum" public access.

In addition, limiting parking on the State Parks property will push many of the visitors to park on the roadsides outside of the limited parking, thus making a parking problem for the County, Cities, Caltrans, and landowners near the beaches. We believe that the current tax-based funding for the parks should be used for free parking before any new improvements are scheduled.

For these reasons we will be following the progress of the proposal through the Coastal Commission process and encourage the CCC to allow the widest participation of people on a variety of positions and concerns.

Thank you for considering this important topic.

Rixanne Wehren  
Chair, Coastal Committee

## Lavine, Ethan@Coastal

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**From:** Judy Hoaglund <jhoaglund@earthlink.net>  
**Sent:** Tuesday, April 14, 2015 5:15 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Appeal No. A-2-SON-13-0219 (California Department of Parks and Recreation, Sonoma Co.)

Dear Reader,

I am writing to ask that the Coastal Commission not institute the \$8 fee on every Sonoma County beach. This is a blow to all the low income people who regularly use these beaches. It will also require that someone monitor the use and check all the cars to see if they have paid. Is this \$8 fee supposed to pay for these additional park employees? Are these fees absolutely necessary? Maybe you could add a fee to a few more beaches, but not all of them. There must be free public access for those who cannot pay.

Thank you,  
Judith Hoaglund

1553 Laguna Rd.  
Santa Rosa, CA 95401

## Lavine, Ethan@Coastal

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**From:** Russell Wells <pelican@sonic.net>  
**Sent:** Tuesday, April 14, 2015 4:16 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Regarding: Appeal No. A-2-SON-13-0219 (California Department of Parks and Recreation, Sonoma Co.)

Dr. Mr. Lavine,

The beaches of California once open to all, freely and without discrimination, are in the process of being closed to those without enough money to pay the fees. This is not only an insult, but is surely contrary to the Coastal Commission's reason for existence. Abandon the plan to charge entrance fees of any amount on the California coast.

Concerned constituents and residents

Russell Wells  
Kathleen Lassiter  
21962 Timber Cove Rd.  
Jenner, CA 95450

**Lavine, Ethan@Coastal**

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**From:** Alexandra Genetti <thewheel@mcn.org>  
**Sent:** Tuesday, April 14, 2015 1:24 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** 8 bucks to enjoy our coast?

Hello

Just wanted to add my voice, this proposed charge is really burdensome for some poorer folks who use the beach as a retreat from the chaos of the world. As citizens of this most beautiful Sonoma county our coast belongs to us already. Charging us above and beyond our taxes is no way to raise the \$\$ you need.

Find another way to proceed.

Alexandra Genetti,  
Cazadero, California

Sent from my iPad

## Lavine, Ethan@Coastal

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**From:** Richard Welch <greyghostfarmrpw@yahoo.com>  
**Sent:** Tuesday, April 14, 2015 7:07 PM  
**To:** Lavine, Ethan@Coastal  
**Subject:** Appeal No. A-2-SON-13-0219 (California Department of Parks and Recreation, Sonoma Co.)

[ethan.lavine@coastal.ca.gov](mailto:ethan.lavine@coastal.ca.gov)

Regarding: Appeal No. A-2-SON-13-0219 (California Department of Parks and Recreation, Sonoma Co.)

Dear Sir:

I wish to add my voice to those who have raised objections to the \$8 dollar beach parking fee being considered by the Coastal Commission. I am a Sonoma County property owner since 1975, and have relied on the Coastal Commission for their principled defense of the rights of the citizens to access their coast. The proposed parking fee, like all user fees, is regressive in its effects on the finances of the lower income citizen; while the comfortable can easily afford such a fee, many others not so well fixed would find it prohibitive. If no other option for financing the beaches is available, which is doubtful, Sonoma County should issue windshield stickers that permit free or substantially reduced fees for County residents. This kind of user fee is really a tax, and rather than being progressively levied on the basis of income or property value, unfairly burdens those who can least afford it.

Sincerely,

Richard P. Welch  
22214 Pacific View Road  
Jenner, CA 95450

**From:** [Sakina Bush](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** proposed fee  
**Date:** Thursday, April 16, 2015 1:24:31 AM

---

It has come to my attention that there is a proposal to charge a fee of \$8.00 to access beaches along the Sonoma County coast. I hope the Coastal Commission will refute this action. These beaches should remain fully accessible to the public and not just to those with affluence. \$8.00 may not seem like much to those who have it but it is an unreasonable amount for those with limited incomes. It is wrong to limit access to public beaches or to create a system where access is based on wealth.

Thank you,

Sakina Bush  
Fort Bragg CA

**From:** [janet\\_schlihs](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** fees charged to visit state and national lands  
**Date:** Thursday, April 16, 2015 7:33:03 AM

---

as a child i went camping all across the western united states with my family. there was NEVER a charge and there NEVER should be. these lands belong to you and me.

janet schlihs

**From:** [Jim Heid](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** comment on proposed beach access fees  
**Date:** Thursday, April 16, 2015 10:06:22 AM

---

To whom it may concern:

As a 25-year resident of the Mendocino coast, I'm writing to respectfully urge the Coastal Commission to reject State Parks' proposal to charge access fees for Sonoma County beaches.

While I understand and respect the fact that State Parks needs funding to maintain its facilities, charging the public to simply park near and access a beach is the wrong way to go about it.

Here in Mendocino County, many of our beaches are used by locals as brief respites during their busy days. I and many people I know frequently stop at the beach for a quick walk and recharge when we're out and about running errands. It's inappropriate to charge someone \$8 -- or, for that matter, any amount -- to take a 20-minute walk and briefly escape the pressures of the day.

Many of the locals who use our beaches don't have a lot of discretionary income. Imposing beach-access fees is discriminatory and unfair. It shouldn't cost as much to access nature for 20 minutes as it does to go to a movie theater for three hours. Indeed, it shouldn't cost anything beyond what we already pay in taxes.

State Parks definitely deserves financial support. But imposing access fees is not the way to do it.

Again, I respectfully urge that the Coastal Commission deny State Parks' desire to charge beach fees.

Sincerely,  
Jim Heid  
PO Box 743  
Albion, CA 95410  
707-937-1747

**From:** [Bonnie Sarrow](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** beach parking fees...  
**Date:** Thursday, April 16, 2015 11:06:02 AM

---

NO, NO, NO, NO...we pay PLENTY OF TAXES ON EVERYTHING, ALL YEAR LONG.  
BEACHES ARE OUR SACRED RIGHT TO ACCESS~!!!!!!!  
bonnie sarrow

**From:** [cflum@mcn.org](mailto:cflum@mcn.org)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [jugglestone@comcast.net](mailto:jugglestone@comcast.net)  
**Subject:** [Fwd: ]  
**Date:** Thursday, April 16, 2015 11:10:09 AM

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----- Original Message -----  
Subject:  
From: cflum@mcn.org  
Date: Thu, April 16, 2015 11:08 am  
To: sonomastateparksappeal@coastal.ca.gov  
Cc: jugglestone@comcast.net  
-----

April 16, 2015

Dear State Parks,

It is unthinkable that the State Parks is considering charging to visit the sea and parklands. The fees for camping already keeps many of the less wealthy of us from going to places that were for hundreds of years free to all.

Please consider this to be a idea that will cause a great hardship for people who are already struggling to meet and join the so called middle class in America. The American Dream is fading fast, as we become a one class society where only the rich have the benefit of beauty and healthy outdoor experiences.

Sincerely,  
Char Flum  
cflum@mcn.org

**From:** [Will Van Sant](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** No Cost for Beaches  
**Date:** Thursday, April 16, 2015 2:46:08 PM

---

Just want to voice my strong disapproval of any kind of fees to access our state beaches. These are public lands that tax dollars fund. A day at the beach should be free for all. If day use fees for beach access start it will be one more step towards privatization of these public beautiful lands.

Will Van Sant  
Ukiah CA

**From:** [Martha Betz](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** fees  
**Date:** Thursday, April 16, 2015 8:39:12 PM

---

Our parks are for us to use and not for you to make money from. We pay our taxes. Leave us our parks.

**From:** [Carmen Goodyear](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Fees for Beaches  
**Date:** Friday, April 17, 2015 9:11:39 AM

---

This is bad idea in every way, for the citizens. Here is the truth:

The public's access to beaches and waterways is guaranteed in the state constitution and by the 1976 Coastal Act, which encourages "maximum access" to such sites.

The State Parks and Coastal Commission will be doing something unconstitutional if they make people pay to enjoy their right to visit CA beaches. As with the "Fire Fee" that the Board of Equalization makes us pay now (and not a penny of that goes to our local volunteer Fire Dept) this fee would line the pockets of state agencies and very little would go to protecting the beaches. Please rethink this proposal and let the people enjoy their constitutional right to CA beaches.

Thank you,

Carmen Goodyear  
Albion, CA 95410

**From:** [Nancy Backus-Meagher](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Proposed fees at beaches  
**Date:** Saturday, April 18, 2015 9:49:20 AM

---

dear Sirs,

I am vehemently opposed to any plan than would involve any sort of fee for the use of our Coastline beaches. Like the air we breathe, the ocean belongs to all who want to visit and Enjoy. Fees for campgrounds have gone up enough to make camping out of reach for many But a walk in the sand, a chance to build sand castles, a view of the mighty surf are all free And there for all of us. Imposing fees would be an unconscionable thing to do.

Sincerely,  
Nancy Meagher  
Little River, CA

Sent from my iPad

**From:** [Annemarie](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** proposal by California Parks and Recreation Department to put "iron rangers" intended to collect money  
**Date:** Monday, April 20, 2015 9:00:14 PM

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20 April 2015

California Coastal Commission 45 Fremont Street, Suite 200  
San Francisco, CA 94105

Dear Commissioners:

This letter is in reference to the proposal by California Parks and Recreation Department to put "iron rangers" intended to collect money for access to and use of public beaches in California, specifically, in our understanding, Sonoma County.

The California Supreme Court cases of Dietz v. King and Gion v. City of Santa Cruz clearly established the right of public access and use of our coastal beaches. The former case involved a landowner charging money for access to a public beach. We are unable to see a meaningful distinction between an access charged by State Parks as opposed to a private landowner. Although the State is trying to raise money from a multitude of sources, denying the public free access to OUR beaches seems a clear manifestation of class warfare. One of the few things a lower income family can do that does not cost money is to spend a day at the seashore. The California Coastal Commission was created by popular vote to insure public access to the beaches and to protect those rights, whether from private landowners or public agencies. Particularly in this case where Parks and Recreation has proved itself to be capable of massive budget mismanagement and the concealing of funds, the idea that this organization should deny the public free access to beaches which are supported by our tax dollars is unconscionable.

Sincerely,  
Annemarie Weibel  
P.O. Box 566  
Albion, CA 95410

tax payer, landlord, have lived in California since 1978

**From:** [Susie De castro](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** No on \$8.00  
**Date:** Thursday, April 23, 2015 3:48:15 PM

---

NO! NO! NO! on \$8.00 to access THE PACIFIC OCEAN. It is my RIGHT and not a privilege to have access to the Ocean. I would be happy to volunteer to offset the price. I am on fixed income.

**From:** [Susie De castro](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** No on \$8.00  
**Date:** Monday, April 27, 2015 2:33:13 PM

---

NO! NO! NO! on \$8.00 to access THEORY PACIFIC OCEAN

**From:** [Sarah Taylor](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Paying for Coastal Access  
**Date:** Monday, April 27, 2015 8:05:47 PM

---

To Whom it May Concern,

I believe it would be unfair to those of us who love the ocean to start charging for day use along the coast. I've never made much money, but I do work, and I do pay my taxes. Please pass the idea of having a mandatory fee for entrance to the park. Thank you.

--Sarah Taylor

**From:** [David](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Don't fee out parks  
**Date:** Wednesday, February 17, 2016 7:19:53 PM

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**From:** [Laura Morgan](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Alienation of diverse minorities, not to mention local residents, engendered by fees  
**Date:** Friday, February 19, 2016 6:18:53 AM

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Dear friends,

As affluent and regular utilizers of the Sonoma Coast Parks proposed for fee collection, We would recommend strongly that those of us who can afford it should pay for those who can't.

A voluntary donation station with explanatory signage would be a greatly preferred method for necessary fee collections. Or an annual or monthly auto-donation program for coastal residents could be proposed. We would welcome such an opportunity and with it, the message of caring to those who cannot afford it would be conveyed.

The auto-pay kiosk at Riverside Park is a glaring example of the alienation that is created when an impersonal, confusing and dysfunctional machine takes the place of free access and park staff are seen as law enforcement rather than friends.

Thanks for your attention to this matter of importance to us all,

Laura Morgan, MD  
Jim Seward, MD  
Sebastopol

Sent from my iPad

**From:** [Carol Sklenicka](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Oppose Sonoma Coast Fee Collection Proposal  
**Date:** Friday, February 19, 2016 9:14:00 PM  
**Importance:** High

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Dear Commissioners,

It's not surprising that the proposal of the California State Department of Parks and Recreation to charge fees in new locations on the Sonoma Coast has met with vociferous opposition. I hope some of you remember that similar proposals have been resisted here before, at least since 1979. We are the home country of Bill Kortum and his spirit lives on here.

Many opponents believe that the requirement of fees for parking at the most accessible locations along our coast is a violation of the Coastal Act. I won't be surprised if there is a court challenge on those grounds.

What disturbs me about this proposal is that the Parks Department has not deigned to explain what benefits their scheme might bring to park users. Will roads, beach access, restrooms, garbage collection be improved? Will more rangers be provided to insure public safety? The so-called "open house" meeting they held in Sebastopol on Feb. 17, 2016 answered none of these questions. It seemed that the administrators were ill-prepared to recommend their own short-sighted proposal. It seemed they had been ordered to come up with something and acted in frustrated desperation. Surely someone in Sacramento has a better idea than this.

We all know that there is a shortage of funding for the parks. Yet no one behind the tables at the meeting in Sebastopol could tell us how much it will cost to install and staff these fee collection stations. It seems very likely that the cost will be as great as the revenue brought in. Apparently no one has analyzed this equation. The whole plan is half-baked and it is opposed by most or all of the organizations that were invited in to consult with the Parks personnel in designing the plan.

Some of the locations where mechanized fee stations are slated for installation have no service at all, Freezeout and Willow Creek. I think Willow Creek is a county road and it is so pot-holed it is drivable only in SUVs. Freezeout has been managed by Landpaths until last month and was open only by permit (but free for those who attended permit orientation).

We strongly urge you to turn down this plan in its present form and to support legislative efforts to find a better method to restore funding for the state beaches that belong to every Californian.

Carol Sklenicka  
Richard Ryan  
P O Box 21  
Duncans Mills CA 95430

**From:** [Debra McGauley](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Deb McGauley](#); [Phil McGauley](#); [Sylvia McGauley](#); [Katy McGauley](#); [Jenny McGauley](#)  
**Subject:** Beach Fees: Commentary for your upcoming meeting on the 24th  
**Date:** Saturday, February 20, 2016 8:07:28 PM

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This is my 2-cents worth on this subject.

The Sonoma Coast is a close, local getaway for everyone in Sonoma County, and beyond. My family has been frequent visitors for over 30 years. It is a peaceful sanctuary for many. It is a family day together for all. It is the LAST place to go spend time with family and/or friends; have a picnic; play; fly kites; seek solace; for FREE. A lot of families cannot afford fees to enjoy a day off with family.

We bought a memorial picnic table for my husbands parents and had it placed at Schoolhouse Beach. With all the "cuts to the coastal state parks budget" already, half the time that parking lot is closed. Even when it isn't, the bathrooms are still closed, there are no garbage cans ANYWHERE; and it's not just at Schoolhouse Beach. We are in discussion with the state parks currently to replace (they took it) the garbage can we installed close to our memorial picnic table that we were servicing.

Bottom line is that if you charge fees for beach access, people will simply park on Hwy. 1 making that treacherous road even more dangerous, plus adding the human factor as they will be walking on Hwy. 1 with children, beach gear, dogs, etc., toward the beach they are headed to.

It's a ridiculous idea.

*Deb McGauley, CTA*

*2375 Donna Maria Way  
Santa Rosa, CA 95401  
(707) 529-6240*

**From:** [Connie Bowen](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Oppose!  
**Date:** Saturday, February 20, 2016 8:36:57 PM

---

I oppose any fees at Sonoma County beaches!  
Connie Bowen

**From:** [Ben Goyhenetche](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** Parking fees - Sonoma Coast  
**Date:** Sunday, February 21, 2016 5:45:37 PM

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Please do not charge us to park at the beach.  
All of us need someplace to go to enjoy nature that is free.

Reduce your staff, cut back on big projects, just keep it simple. We will all benefit from it.

Bit by bit our natural freedom is being taken away from us..I've been surfing the Sonoma Coast since 1977.

We used to be able to have beach fires. Now no beach fires.

Dogs were allowed on all beaches. Now no dogs on most beaches.

Beaches were driven on only in emergencies. Now regularly for no apparent reason, other than to show utter disrespect for the natural beauty of the area.- Shame on all of you. This isn't L.A. It's wild and free. Let's keep it that way!

I liked it better when Sheriff Murphy and just a few others were on patrol. Now there is a glut of various law enforcement.  
Really , it's over kill, and I'm sure very expensive.

Respectfully, Ben Goyhenetche  
Bodega Bay, CA

**From:** [Steven Rock](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** paying to use Sonoma beaches  
**Date:** Sunday, February 21, 2016 7:51:52 PM

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I don't know if installing paid parking is consistent with the Coastal Act. But it certainly inhibits usage. Somethings should remain free.

Steven Rock  
Berkeley, CA

**From:** [Joanna Martinelli](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Fee Proposal Appeal Letter for Wed 02/24/16  
**Date:** Monday, February 22, 2016 2:03:55 AM

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To Whom It May Concern:

I cannot attend the scheduled meeting this Wednesday, February 24, 2016. I'm inspired to share a few thoughts with you about this complex issue. I've been a Bodega Bay Resident since 1987, once married to (and fishing with) a fisherman who has been here since the 1950's.

On more popular days at the Coast (guaranteed to increase as time goes on), people park on the delicate shoulders off the highway, impacting the integrity of the flora – compromising integrity against erosion. They park in No Parking areas. I do not know for sure, but I believe there is little regulatory follow through.

We need to really look at the growing difficulty with over population. How do we deal with this? I appreciate sentiments regarding wanting to keep the area free and accessible to everyone, and yet.... what about stewardship? The motivation certainly won't come from the occasional visitor.

I have seen the delicate trails on Bodega head become four lane "freeways" with people pushing their twin size baby strollers along the cliffs for a ways. So much photo taking of everything and everyone leaves little room for reverie and awe. The majority population influences the general ambiance and reduces it to a Disney experience for everyone.

I would like to submit the idea that the State install toll stations (residents/employee-employers exempt) on the roads that enter Highway One along certain areas that are subject to over use. The cost of maintaining trails and stairs and parking lots, cleaning beaches, porta potties, etc. - not to mention (the now quiet discussion about) emergency services... all could be subsidized by the toll fee for Highway One. Spread amongst motorists, per car or per capita, the fee could be low and people would have the sense of "free access" to all resources. I don't know if that would slow the growing pressure, but it sure would increase funding to do ecological repair, create signage, pay someone to enforce the "No parking" and shoulder areas that people abuse.

If cars were towed, then people wouldn't park there. If nearby neighborhoods were allowed to restrict beach/all day parking so the overflow didn't impact safety and privacy of residential areas, and cars were towed, people would go to another area farther north, less populated, or decide not to come on heavy traffic weekends, etc.

People won't self regulate. I understand the idea of iron rangers, but they won't work either. Visitors will just overflow to the neighborhoods or park on fragile shoulders.

It's definitely a challenge to regulate sensitivity. We really must pay close attention to the fact that we have waited too long to protect many of our "commonly owned" resources – and now it's too late.

These are My concerns.  
Any comments from you would be much appreciated.

Joanna Martinelli Strang  
281 Calle del Sol  
1205 Bay View  
Bodega Bay, CA 94923

**From:** [Kathleen Bylsma](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** State park fee for public access  
**Date:** Monday, February 22, 2016 11:18:38 AM

---

Dear Staff,

Please don't even consider an access fee to use the PUBLIC beach. We are already charged and taxed to the limit. We have paid to use the beach. Don't get greedy.

Kathleen Bylsma

**From:** [Marsha Calhoun](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Fee Collection Device  
**Date:** Monday, February 22, 2016 2:43:33 PM

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I have lived in Sonoma County for forty years, and was initially drawn here in part because of access to our beautiful California coastline. I urge you not to cut off this access by establishing fee collection devices that will discourage or disallow poorer people from enjoying the coastline that belongs to us all. When I was younger and when my children were younger, sometimes going to the beach was our only low-cost entertainment, and we could not have afforded to pay parking fees. Please, please do not cut anyone off from appreciating and enjoying our unique coastline because they cannot afford to park and there is no other way to get to the beach. We just don't need to further divide our people economically by telling those with less money that they are not permitted to avail themselves of this beautiful, educational, stress-relieving, family-friendly, community-inspiring delight that is everyone's right.

Thank you.

Marsha Calhoun

**From:** [tiggy344](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Fees  
**Date:** Tuesday, February 23, 2016 6:52:55 AM

---

I am not in agreement with your proposal to collect parking fees at some of our beaches in Soboma county. Who will benefit from this, and how?  
I can say that in over 60 years I have not seen that the beaches have been improved in Sonoma or Mendocino counties because of State fees collected. It has grown more beuracracy and salaries.Where is this money spent? Southern California? General fund?  
Let us follow the same path as Oregon, where all beaches are free to use by everone. Only charge for campers.  
Thank you,  
Barbara Haen  
Windsor Ca. 95492

Sent from my Verizon Wireless 4G LTE smartphone

**From:** [Laura Duggan](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** No Fees on the Sonoma Coast  
**Date:** Tuesday, February 23, 2016 6:54:30 AM

---

Dear Commissioners, et al,

I am writing to express my concerns about putting parking fees along the Sonoma Coast. Several of the planned locations occur where we find the begin and end of the Kortum trail, named after Bill Kortum, who dedicated his life to preserving equal and free access to the Sonoma Coast. It was in this spirit that the Coastal Commission was created as well.

Putting parking fees at the coast effectively blocks access as much as if you had put Private Property signs there. Highway 1 along the road has NO parking or shoulders other than the areas created for parking to hike the coast. Those who cannot afford the parking fee will have NO recourse for parking. In addition, many tourists drive Highway 1 and simply want to take a moment to look at the coast safely. They are not planning to stop for an entire day. Putting a parking fee there will simply encourage dangerous driving, as people will try and slow down, look, gaze, and not drive.

I sincerely hope you understand how important it is to keep the Sonoma Coast accessible and free to everyone that comes.

Laura Duggan  
7523 Lynch Road  
Sebastopol, CA 95472

**From:** [Dick Butler](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Sarah Butler](#); [Carol Butler](#); [Georgia Butler](#); [Mac Butler](#)  
**Subject:** State Beach Fees  
**Date:** Tuesday, February 23, 2016 7:53:48 AM

---

I strongly oppose the State Park's proposal to charge a fee for visitors to the Sonoma coast.

The state's coast and beaches are a public trust resource and I believe the California Constitution guarantees access to ocean waters and that a fee impedes that access.

The people's coastal resource should not be viewed as a cash cow for State Parks, or any other state agency. California State Parks Department must be funded by a line-item in the State budget and should not be allowed to increase revenue through arbitrary and capricious fees.

Imposing a fee on visitors to Sonoma County beaches would reduce access and user-days, which in turn will reduce the economic benefits that beaches provide to coastal communities.

Sincerely,  
Richard W Butler

**From:** [Sarah Butler](#)  
**To:** [SonomaStateParksAppeal@Coastal](#)  
**Cc:** [Dick Butler](#)  
**Subject:** Re: State Beach Fees  
**Date:** Tuesday, February 23, 2016 9:35:59 AM

---

> On Feb 23, 2016, at 7:53 AM, Dick Butler <dick.butler9@gmail.com> wrote:  
>  
> I strongly oppose the State Park's proposal to charge a fee for visitors to the Sonoma coast.  
>  
> The state's coast and beaches are a public trust resource and I believe the California Constitution guarantees access to ocean waters and that a fee impedes that access.  
>  
> The people's coastal resource should not be viewed as a cash cow for State Parks, or any other state agency. California State Parks Department must be funded by a line-item in the State budget and should not be allowed to increase revenue through arbitrary and capricious fees.  
>  
> Imposing a fee on visitors to Sonoma County beaches would reduce access and user-days, which in turn will reduce the economic benefits that beaches provide to coastal communities.  
>  
> Sincerely,  
> Sarah Nancy Butler

**From:** [Gerry Schultz](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** are you listening to the people who live here?  
**Date:** Tuesday, February 23, 2016 11:17:42 AM

---

I am a musician and an educator...not an activist.

The on-going proposal from the State Parks Department to the Coastal Commission regarding:  
IRON RANGERS ON SONOMA COUNTY BEACHES

....remains a proposal that goes against the grain.  
This proposal is offensive!

For 3 - 4 years, I have been writing to the **State Parks** (including Roy Streams ..spelling?....before he retired),  
to the **Coastal Commission** urging them to deny this proposal,  
to **Efren Carillo, our 5th District Supervisor**,  
and now to the **candidates** for Efren's seat.

**Each time, I have given a list of viable ALTERNATIVES to Iron Rangers.**

- **Low-risk County Jail prisoners to do clean-up and maintenance.**
- **Court-mandated "community service" individuals, brought in small groups to do clean up and maintenance.**
- **High School students who do "Community Service"**
- **Volunteer Center of Sonoma County organizing clean up and maintenance.**
- **Businesses "Adopting a Beach".**
- **Senior Centers organizing clean-up and maintenance crews.**
- **California Conservation Corp. work parties to fix the parking lots and to trail maintenance.**
- **State Parks Dept. creating clean-up and maintenance crews instead of paying someone to sit at an Iron Ranger.**

My husband and I have lived in Occidental (near the coast) for 40 years. We enjoy popping over there for a break in our day, a walk, a picnic, a quick look for whales at Bodega Head.

Now...we will **refuse to pay** for this wonderful activity.  
Instead...we will park our car and view OUR COAST and **refuse to pay** to step on the coastline.

What income do you anticipate gaining from IRON RANGERS?  
not much

*Gerry Schultz*  
*Executive Director*  
*California Redwood Chorale (501c3)*  
*Tax ID # 91 - 1805049*

[www.californiaredwoodchorale.org](http://www.californiaredwoodchorale.org)  
Facebook: *California Redwood Chorale*

**From:** [Gay Bishop](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Beach Fees  
**Date:** Tuesday, February 23, 2016 2:18:48 PM

---

I am a person with little income and large love of the land. A most important activity in my life is hiking and birdwatching. Putting a price on the outdoors with entrance fees is like making the world a museum. Only those with money will be able to afford and enjoy the most treasured resources of our county. We are so fortunate to be blessed with such surroundings, keep these treasures available to everyone. Not just those with money..

People do not love something or take care of it if they can't experience it.

The earth needs all the advocates it can get at this crucial time of climate change, overpopulation and on and on.

Please hear the dissenting voices and do not do this.

Gay Bishop

Member of Beachwatch and Stewards of Redwoods and Coast.

Madrone Audubon member

**From:** [Clare Najarian](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** NO FEES AT THE BEACH  
**Date:** Tuesday, February 23, 2016 2:46:19 PM

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Sonoma State Parks personnel and those responsible for this reprehensible idea of charging to see the sunset!

The meeting in Sebastopol on Wed. of last week was a travesty. Public Comment is a right just as free beaches are a right of the people. Your short notice on a very poorly run meeting was duly noted. I would like to see you put forth a budget that shows exactly what you are spending to hold our dearly beloved beaches hostage. From the signage on the road, the actual design of the grotesque kiosks, the building, supplies, the construction costs, the salaries, the liability insurance, the cost of maintenance and the personnel training. We will not go quietly over this issue as you may have guessed. We HAVE A RIGHT TO VISIT BODEGA HEAD, SHELL BEACH, GOAT ROCK without paying one dime.

The ocean and beaches are not commodities to be charged permission to visit. Pay to play does not work. All of our state beaches from Crescent City to San Diego should never become places for the state to charge. I WILL NEVER PAY TO SEE THE SUNSET AT BODEGA HEAD; I WILL NEVER PAY TO HIKE THE BILL KORTUM TRAIL; I WILL NEVER PAY TO WALK THE BLUFFS OF THE SHELL BEACH TRAIL; I WILL NEVER PAY TO VISIT GOAT ROCK.....EVER!!!!

The California State Parks government is not doing a good job of managing our coastal resources; simply asking for money is a slap in the face; as a writer in this morning's PD put forth: more and more beaches will become fee-only and then finally the last affordable entertainment in Sonoma County will be gone.

Our coast belongs to all of us; NOT TO THE STATE PARKS, OR THE GOVERNOR whose deeply disappointing appointment of 4 traitors to the coastal commissioners is also duly noted.

You and your state cohorts have lost critical trust in your ability to manage our "free to the public resources".

It is my hope that some of you lose your jobs...that some of you turn your minds around on this issue; that some of you will listen and pay attention to the rights of the people.

Clare Najarian  
357 Neva St  
Sebastopol, CA 95472

**From:** [Kate Fenton](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Caroline Higgins](#); [NORMA JELLISON](#); [Carol Sklenicka](#)  
**Subject:** To Nancy Cave, CA Coastal Commission  
**Date:** Tuesday, February 23, 2016 3:23:45 PM

---

February 23, 2016

Nancy Cave

California Coastal Commission

45 Fremont Street – Suite 2000

San Francisco, CA 94105-2219

Dear Ms. Cave:

The proposal of the California State Department of Parks and Recreation to charge fees in new locations on the Sonoma Coast has been resisted more than once over the years. I realize Northern California is something of a holdout but we stand for the way things should be, in the spirit of the Coastal Act.

The Parks Department does not seem to have much of a plan in all this. Costs, numbers of rangers on duty, and improvements and benefits are not even specified. Personnel from Sacramento sent to Sebastopol on Feb. 17 to push this proposal on the public were really clueless about the area and just taking orders from above. The public came up with several better ideas that could be implemented with much less expense, trouble and offensiveness.

I am a 41-year resident of lower Willow Creek Rd. and find it a pointless choice for a kiosk. This county road is in deplorable shape and there are no parking or other services except for one of two campgrounds that currently opens in season, and one hiking trail.

Please work creatively with ideas presented by the public and with more sensible and practical legislative efforts to restore funding for our state beaches, especially in a time when the pressures are so great to develop our coast and to squeeze more out of the income-challenged.

Thank you for caring.

Sincerely yours,

Kate Fenton

PO Box 86

Jenner, CA 95450

--

Kate Fenton  
[www.willowcreekdesigns.net](http://www.willowcreekdesigns.net)

**From:** [Kate Fenton](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Caroline Higgins](#); [NORMA JELLISON](#); [Carol Sklenicka](#)  
**Subject:** To Nancy Cave, CA Coastal Commission  
**Date:** Tuesday, February 23, 2016 3:23:59 PM

---

February 23, 2016

Nancy Cave

California Coastal Commission

45 Fremont Street – Suite 2000

San Francisco, CA 94105-2219

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Please work creatively with ideas presented by the public and with more sensible and practical legislative efforts to restore funding for our state beaches, especially in a time when the pressures are so great to develop our coast and to squeeze more out of the income-challenged.

Thank you for caring.

Sincerely yours,

Kate Fenton

PO Box 86

Jenner, CA 95450

--

Kate Fenton  
[www.willowcreekdesigns.net](http://www.willowcreekdesigns.net)

**From:** [Carol Goodwin Blick](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Please don't charge for beach access  
**Date:** Tuesday, February 23, 2016 9:12:57 PM

---

Please stop the erosion of our community commons. Please don't widen the gap between the haves and the have nots. Please don't charge for California beach access. Thank you.

Carol Goodwin Blick  
Residence: 426 Floral Way, Rohnert Park, CA 94928  
Mailing address: PO Box 3055, Rohnert Park, CA 94927

**From:** [George von Haunalter](mailto:George.von.Haunalter)  
**To:** [letters@pressdemocrat.com](mailto:letters@pressdemocrat.com)  
**Cc:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma State Beach Tax  
**Date:** Tuesday, February 23, 2016 10:44:51 PM

---

Would it not be pleasant if and when fees on Sonoma state beaches reduce the rabble so that those of us who can easily afford the fees have more space to our selves? In addition the opening line of Woody Guthrie's song "This land is your land" can be changed from "California to the New York Island" to "California excluding its beaches to the New York island."

The appetite of the state for revenue knows no boundaries and one day there may be a tax on air that we breath; that can be easily estimated given the average lung capacity and life expectancy. Don't laugh, with the state of US politics today and the leading candidates, anything is possible.

But seriously for a moment: the beaches are one of the few places left (free state parks are long gone) where people with little or no disposable income can enjoy benefits to their psyche and health and community spirit and appreciation of the environment. What a downright crime it would be to reduce these benefits for those who need them the most. Wise up ye State Park officials who are contemplating a beach tax: such antics hurt our society more than any good coming from the many frivolous expenditures of our money that a beach tax helps to save.

George von Haunalter, Santa Rosa

**From:** [Vesta Copestakes](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** Coastal Beach Fee Stations  
**Date:** Wednesday, February 24, 2016 7:30:31 AM

---

I believe this will cause more harm than generate increased income:

When people have to PAY to access one beach - they will go to another that is FREE. Our public beaches are fairly close to each other, so to find a free one further up or down the coast is not difficult. But these other beaches may not have the facilities for parking and restrooms. Therefore people will park where it is not safe and will urinate, etc. where they can find a spot of privacy. This will put more pressure on the free beaches and cause more harm to the landscape. We have seen this on the Russian River. People find access to the river where there is no park fee. They leave trash, have parties, start fires. The destruction is huge and is mostly cleaned up by volunteers every fall before flood season. But the destruction is there from broken glass to feces in the bushes.

I believe there is a more cost-effective solution to raising money to maintain our beaches. I'd like to see the license fee back on the ballot. With increased awareness it may pass the next time.

A Coastal Park Membership could help. The CA State Parks membership is very expensive of people who just go to the beach, but do not hike, camp, etc. Can you issue just a Coastal Membership - a simple reduced rate annual pass that gives people an opportunity to donate to beach maintenance?

Ultimately, the beaches need to be free because they are unique. We have ONE West Coast and it belongs to everyone - rich or poor. These kiosks and a problem waiting to happen and will be expensive to maintain. Please point me to your cost analysis. I don't think I've seen that information.

Thank you for your time and concern for our beaches.

Vesta Copestakes, publisher  
**The Sonoma County Gazette**  
6490 Front Street #300  
Forestville, CA 95436  
<http://www.sonomacountygazette.com/>  
**707-887-0253**  
FAX: 707-820-8127  
Cell: 707-889-0069

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**From:** [Mary Anne Sobieraj](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** State Parks Proposal to Implement Fee Stations  
**Date:** Wednesday, February 24, 2016 10:28:32 AM  
**Attachments:** [Coastal Commission meeting re Iron Rangers at Sonoma Coast.doc](#)

---

Please see attached. Thanks.

--

Mary Anne Sobieraj  
90 Sequoia Ridge Road  
Cazadero 95421

Austin Creek Alliance  
90 Sequoia Ridge Road  
Cazadero, CA 95421

Nancy Cave  
California Coastal Commission  
Delivered by email to: [SonomaStateParksAppeal@Coastal.CA.gov](mailto:SonomaStateParksAppeal@Coastal.CA.gov)

**Re: February 24, 2016, Coastal Commission meeting re Iron Rangers at Sonoma Coast**

My concerns are varied with regard to the State of California's plans to implement parking fees at various sites along the Sonoma County Coast.

I will leave for others a discussion of the economic feasibility of manning kiosks and policing compliance.

I have been concerned about the State plans to charge access fees along the Sonoma Coast since the 1980's. At the time my sons were just getting into surfing. I was delighted that they had a place to go to that was within their (and my) meager budget. Parking fees would have changed what has become for them a lifelong passion.

Access to our coast is still vital to citizens whether or not they have the wherewithal to pay proposed fees. The following sections of the Coastal Act, are I believe germane.

- **Section 30210 Access:** *In carrying out the requirement of [Section 4 of Article X of the California Constitution](#), maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people...*
- **Section 30213:** *Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided.*

The income divide in Sonoma County, as well as the rest of the state cannot be overlooked: There are folks who will not have access if these proposed fees are put in place.

Sincerely, Mary Anne Sobieraj

Cc: Norma Jellison, Carol Sklenicka

**From:** [Joyce Higgins](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** Fees  
**Date:** Wednesday, February 24, 2016 10:38:37 AM

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Dear Folks:

I want to speak to the institution of fees at more of the Sonoma beaches. I do understand that it's costly to maintain parks. However, I feel it's discriminatory against those who do not have a lot of money. That includes our many lower income folks who keep our county going with their work, many seniors on fixed income and young surfers.

We all have a right to enjoy our state beaches because they belong to all of us, and we should all have equal, free access to this great natural resource on our coast line. Many of us, as seen in the past, feel very strongly about this.

Thank you for your further consideration to the needs of all of us living near the coast in Sonoma County.

Joyce Higgins  
309 Rio Vista Lane  
Rohnert Park, CA

**From:** [Kathie Lowrey](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Michele Luna](#); [DSK](#)  
**Subject:** Sonoma Coast SP Parking Fees  
**Date:** Wednesday, February 24, 2016 10:58:00 AM  
**Attachments:** [Thoughts on Sonoma Coast SP Fees.docx](#)

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Good morning, Nancy,

Attached are some issues that occurred to me as a CEQA professional during the 2/17/2016 DPR meeting in Sebastopol. Thank you for hosting a follow-up meeting this evening in Santa Rosa. I am planning to attend.

Best regards,

Kathie

*Kathie Lowrey, Principal/Senior Environmental Planner  
Prunuske Chatham, Inc.  
707.849.1192 cell  
707.824.4601 ext. 105*

## Thoughts on Sonoma Coast SP Fees

### CEQA

#### When Does a Lead Agency Determine the Appropriate Level of CEQA Review?

- The intent of CEQA is to identify and disclose potential environmental effects of a lead agency's actions; to involve the public and other governmental agencies in project planning and review; and to identify reasonable and feasible measures to avoid or minimize potential impacts on the environment. It is not just a paperwork process with a predetermined outcome. Preparation of a CEQA Initial Study is fundamental to identifying impacts, developing mitigation, and assisting the lead agency to determine if changes as a result of project implementation would be significant. At the 2/17/16 DPR meeting in Sebastopol, DPR representatives stated that the Initial Study is not done; yet it was also stated that a [Mitigated] Negative Declaration [M]ND will be prepared. As a CEQA professional for over 20 years, I am concerned and unclear how this determination has been made without full consideration of potential impacts, avoidance and mitigation measures, and findings of significance in a completed Initial Study.
- Bottom-line question is on what basis has DPR made the decision that there is no "fair argument" that specific impacts cannot be reduced to a less-than-significant level? If such an argument can be made, an EIR is required.

#### Are CEQA Scoping Meetings Appropriate?

- Clearly, those citizens present at the 2/17/16 event thought they were attending a meeting in which their concerns and ideas would be heard—what is referred to as a "scoping" meeting that occurs before an environmental document is circulated for review and comment. When queried during the break-out session, DPR's representative's response was that scoping meetings are not required since the decision to prepare a [M]ND had already been made. However, a lead agency may always choose to conduct scoping meetings in order to inform the CEQA process and to honor the spirit of the Legislature's intent that CEQA be inclusive.
- If the project is indeed "of statewide importance" triggering CCC appeal, surely scoping to receive public input from those who have far more knowledge of the issues of local concern and potential impacts of the proposed project than someone in Sacramento would be beneficial. Although one can comment on a CEQA document during the official public comment period, it is not the same as helping to define the project. Once circulated, the only recourse available to the public if there is disagreement about the findings in a published CEQA document is in the courts.

#### Other CEQA Issues of Concern

- What other alternatives were considered?
- What consultation with Caltrans has occurred?
- How are potential impacts from social trails created by folks who choose not to pay the fee and park along the road (e.g., sensitive habitat degradation and erosion) to be mitigated to a less-than-significant level? How is public safety to be addressed for folks who choose to park along the road? How are visual effects from future no parking signs to be mitigated to a less-than-significant level?
- What outreach has occurred with local Tribal representatives? What are their concerns?

#### Other Issues of Concern

- What are the financial projections and business plan (i.e., why are these fees needed; what is the financial goal; what will it cost to implement; what will it cost to run; how much will it earn)?
- How has the issue of social injustice been considered, and what measures are proposed?

Submitted 02/24/16 by Kathie Lowrey ([Kathie@pcz.com](mailto:Kathie@pcz.com); 200D Foss Creek Circle, Healdsburg, CA 95448).

**From:** [Leah Gold](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** No on beach fees!  
**Date:** Wednesday, February 24, 2016 12:01:44 PM

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Park Commissioners,

Please add my voice to those who oppose fee collection at our Sonoma beaches. It's not news to you, I assume, that middle- and lower-income people are increasingly squeezed in our current economy. It's important to have relaxing and uplifting activities you can do for free - like a trip to the beach. Our beaches, which we all own in common.

Fee collection would trigger enforcement costs and also create impetus for beachgoers to avoid the lots and park along the roadside instead, creating unsafe conditions. Surely there must be another way to increase funding for park maintenance. How about a voluntary contribution? Perhaps your contribution envelope stub could also serve as a lottery ticket for a quarterly drawing.

Sincerely,

Leah Gold  
439 Grant St.  
Healdsburg, CA 95448

**From:** [Rich Panter](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Iron Rangers on the Sonoma Coast  
**Date:** Wednesday, February 24, 2016 6:23:22 PM

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The current proposal, with iron rangers at several select beaches, will significantly increase attendance and traffic at all the other nearby beaches - none of which have the parking space to accommodate them. The overflow will park along the highway, creating a large potential for many car and pedestrian accidents. Also, these increased numbers will increase amount of trash and refuse on the beaches and make it even more difficult than it now is for wildlife - mainly shorebirds.

Given that none of the funds generated from the iron rangers will funneled to State Parks, nor to the Bodega Bay Fire Department, how will this proposal result in anything but degraded beaches for both people and birds?

Rich Panter  
293 Calle del Sol  
Bodega Bay, CA 94923

ranter@gmail.com

**From:** [victorsund@comcast.net](mailto:victorsund@comcast.net)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma Coast  
**Date:** Wednesday, February 24, 2016 8:44:56 PM  
**Attachments:** [Nancy Cave CCC.odt](#)

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Dear Coastal Commission staff-

I attended the meeting at Morro Bay, the meeting in Sebastopol last Wednesday and tonight's in Santa Rosa.

Attached is my letter to you all.

Victor K. Sund.

Nancy Cave and Coastal Commission staff  
Ca. Coastal Commission  
45 Fremont St. # 2000  
San Francisco

Feb. 24, 2016

Re: Meetings in Sonoma county to discuss the State Park plan for iron rangers and kiosks on the Sonoma Coast beaches.

Dear Ms. Cave,

I attended the Coastal Commission meeting in Morro Bay and recognized clearly that Charles Lester's staff was in a great majority against his firing by the commission. I was there with Surf rider to add my voice in his support. I also attended last Wednesday's meeting in Sebastopol and tonight's meeting in Santa Rosa. The sign I made says "La Playa Es De Todos" on one side and "Keep The Sea Free" on the other side. My family is from El Salvador, Spanish is my first language but I am far from underprivileged. The Russian River is my home river and Goat Rock is my home beach having lived in Sonoma County since the early 50's. I've had a home in Jenner for over 22 years. I have taken part if not organized beach cleanups since before it was cool to do so.

I am a member and volunteer instructor of Bay Area Sea Kayakers (Bask.org) a 500 member sea kayaking organization. We often launch from Goat Rock and paddle north to do rescue training and rock garden safety training. Some of our members travel from Nevada and Sacramento to train in the Goat Rock area. An added cost will make it tougher for them to decide to visit our coast.

Before going to Morro Bay and listening to the hundreds of eloquent citizens speak in support of Charles Lester, I was neutral on the issue of the iron rangers as I can just paddle to the beaches from my house. But after listening to dozens of people speak in favor of keeping the access for the poor and minority children of our society, I changed my mind and decided that yes, the experience of visiting the sea needs to be kept free.

Also, our Sonoma County Supervisors, although staying in front of the issue of coastal access, are quite challenged by their economic beholdeness to the wine industry (you can't get elected around here without wine industry money) which seeks to expand onto our coastal hills. The Supervisors are struggling with the elements of the Local Coastal Plan. That was touched upon tonight by a member of the Conservation Action group and also by Richard Charter. At the Russian River estuary at Jenner we also have trouble with leaking septic systems, and a county code enforcement dept. with staff that is unwilling to investigate claims of unsanitary conditions.

I support a strong Coastal Commission staff that is willing to look at the problems of coastal river health and help our county supervisors draft our Local Coastal Plan with some teeth. As it is now, it is toothless. Thanks for listening to the overwhelming amount of neighbors who will fight hard to keep our beaches free.

Victor K. Sund  
10847 Hwy 1, Jenner Ca. 95450  
707-4814608  
victorsund@comcast.net

**From:** [jarbarabean@comcast.net](mailto:jarbarabean@comcast.net)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Beach fees  
**Date:** Thursday, February 25, 2016 9:25:06 AM  
**Attachments:** [BeachFeeProtest.pdf](#)

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Please see attached pdf for my letter with pictures.  
My contact info is also on the pdf.  
Barbara Delonno

February 18, 2016

California Coastal Commission  
45 Fremont Street #2000  
San Francisco, CA 94105

To Whom it May Concern:

I am writing today regarding proposed beach fees in Sonoma County. I attended a meeting last night in Sebastopol where the people from State Parks presented the plan to collect fees at our public beaches. There was overwhelming opposition to the plan but no formal opportunity for the public to respond. We had to be heard by rudely interjecting comments. This puts the State Parks people trying to run the meeting in a very uncomfortable position. I think there were about 125 people there, all opposed to the plan. It is unfair

to unveil this terrible proposal and expect all of these people to just sit there and listen and make comments two months later. I went around and looked at the maps but after a while I just felt sick. The idea of charging fees for these places! I didn't have any questions. I don't agree with this method of managing parks. I feel it is unethical. These parks are set aside for us because we have a need for human habitat. People need connection with nature. It helps our feeling of well-being and sanity. The beautiful scenes on our coast inspire people and give them beauty in their lives. Access should not be limited by charging money. By ourselves we could not afford these lands. But together we can maintain and enjoy these places. I also believe in free public libraries, free public bathrooms, free public drinking fountains, free public schools and free churches. I would have the same sick feeling if any of the above started charging money. These things provide for human needs and should not be collecting fees. It's not like buying a latte or a movie ticket, it's not a commodity, it's not a luxury item. It's something that people need to satisfy their souls. We should want to make sure that everyone can experience the outdoors. I am not comforted by the idea that most of the beaches will remain free. People use all of the beaches. On a sunny day on a weekend it can be hard to find a place to park! The fee collection is a bad precedent and I don't want to see it anywhere. Sonoma County Regional Parks has taken away free public access to most of our county



parks. I have lived in this county for 34 years and I have seen our parks go from being free to costing \$7.00 to park. They never even asked the voters and taxpayers. They set up pay stations without our consent. Once pay stations are set up, the price can be jacked up, and more can be added to the system. I disagree with collecting money for the parks in this way for five reasons.

1. There is no adjustment for how much an individual can afford. There were proposals in the documents for special rates for low income people, but they would have to apply. I don't agree with this approach. I think the money should be gotten from taxes so that people will be supporting the parks according to how much taxable income they have, not according to how much they like the beach! Wouldn't it be interesting to fund war and military

that way- only the people who think it's a good idea can fund it! I'm kidding, but the point is that these places belong to us all, and should be funded by us all according to how much we can afford.

2. The infrastructure needed to collect fees is a waste of money. We want the money for parks to go directly to maintaining the park- not to the manufacture and installation of pay stations and the surrounding fencing, concrete, or the paperwork, tickets, monitoring and citations that go with charging for parking.

3. It is a form of harassment to ask people for money every time they go to a public beach. It degrades the experience of going to the beach. It doesn't feel like this is our land and our park if someone is charging money.

4. Park rangers become parking police. I'm not sure if it would work the same but in Sonoma County, our park



rangers are the ones enforcing parking. I want the rangers to be seen as helpful people watching the park and making sure everything is okay, people you would trust and turn to if you had a problem, not the parking police!

5. It discriminates against individual users and short term visitors by making access proportionally less affordable.

***The beach I go to most often is Goat Rock, one of the proposed fee sites.***

The Russian River runs into the ocean there and there is an abundance of wildlife to watch- seagulls, pelicans, cormorants, ducks, harbor seals, etc. I have many pictures at the ocean over the years, but the majority are from Goat Rock. I probably went there 15 times this year. So you would charge me \$120 for going to this public park! I went to other beaches too! I am not comforted by the idea of a park pass. These are public parks and we are the public. We shouldn't need to buy a pass!

Basically, I would like to see the parks maintained

simply, as they have been. All the beaches need is a place to park and a bathroom. We don't need programs, we don't need manned kiosks, we don't need extra fencing. We just need a place to park and a bathroom, and some occasional trail work, for safety.

The meeting in Sebastopol the other night was the tip of the iceberg as far as opposition to the plan in this county. Last night's meeting shows how many angry people you can get on the spur of the moment on a rainy night. Wait until we get the word out! I really

think it's a waste of time and money to continue to pursue and develop a plan that is so thoroughly rejected by our community. Save a lot of time, money and frustration! Give this up now! 🍀

We need other solutions. I voted to reinstate the vehicle license fee, because I heard that it used to be a major source of money for the state parks until the governor ended it. At the time our parks were threatened with closure. I'm not opposed to paying for maintenance for parks through taxes or through a VLF. I just don't want to see pay stations at the entrance of places that are supposed to be ours. I would not be opposed to having some

limited concessions at certain locations if that could help make the money to maintain the parks. I don't know how other people would feel about it, but I think you could sell a lot of coffee, pre-made sandwiches and fruit at Goat Rock.

There is already running water there, and there is room for a building. It would be something to help people's experience instead of ripping them off.

In summary, I think it is unethical, inefficient and works against our quality of life to charge people for daytime visits to their public parks. Please find another way.

Sincerely,

Barbara DeIonno

8175 Park Av, Forestville CA 95436

jarbarabean@comcast.net 707-887-9565



**From:** [Lillian Rhinehart](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Keith Rhinehart](#)  
**Subject:** More coastal parks with fees required.  
**Date:** Thursday, February 25, 2016 12:11:43 PM

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You surely know the history of COAST and how it protected public Access to the beaches along the California coast starting with Sea Ranch. From these actions came the development of the California Coastal Commission, continuing public access and careful coastal commercial development. These hard fought achievements were not created for the Sonoma State Parks to develop entrance fees for all beaches to such an extent as to deprive our most needy citizens from our shores. Where are the recreational opportunities for low income families to access these beaches? Your greed and lack of concern is obvious. Shame on you.  
Lillian Rhinehart

Sent from my iPad

**From:** [andie\\_barcelo](mailto:andie_barcelo)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma County coastal pay-to-play proposals  
**Date:** Friday, February 26, 2016 10:40:39 AM

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Please accept this letter as opposition to your recently proposed effort to increase the cost of accessing local Sonoma County coastal beaches. I do not feel that this is beneficial to the residents of Sonoma County and the negative impacts are substantial.

As Sonoma County increases in popularity and draws the attention of "big money", it has also become increasingly unaffordable. Limiting our access to the local beaches is tantamount to imposing a sanction on people that already have difficulties affording daily needs. Many families and elderly people use the beaches daily. I personally have had very positive moments in my life at Goat Rock during times that I would never have been able to afford pay-to-play access.

This action is in conflict with the California Coastal Act and the Sonoma County Local Coast Plan, both of which prioritize coastal access for all Californians, irrespective of income. Add to that the obvious likelihood that those that cannot or will not pay the fee will then begin parking outside the park on narrow roads that are already overwhelmed with new tourist traffic, creating a congestion of foot-traffic in conflict with heavy vehicle traffic (and drivers who are oftentimes wine'd already).

It is clear that your proposal is short-sighted and driven by the agenda of a few. Please stop trying to further deprive the citizens from accessing the most beautiful of our resources and stop the agenda to secure coastal access for the rich & wealthy who already have the ability to secure private beaches in plenty of other areas.

Sincerely,  
Andie Barceló

**From:** [Sara Marijuan de Areba](#)  
**To:** [vesta@sonic.net](mailto:vesta@sonic.net)  
**Subject:** Press Release  
**Date:** Friday, February 26, 2016 12:21:22 PM  
**Attachments:** [EGM\\_Release.pdf](#)

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After its award winning screening to sold out audiences at the Boston Science Fiction Film Festival, we are please to announce the west coast premiere of the feature film "Einstein's God Model".

We send you attached the press release, everything you can help us out would really appreciate it.

Trailer: <https://vimeo.com/142038491>

Website: <http://einsteinsgodmodel.com/>

GroupOn discount: <https://www.groupon.com/deals/silver-scream-festival> (up to 46% off).

Yours truly, Philip T. Johnson, Kenneth Hughes, and Craig Dow (producers).

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**Sara Marijuan de Areba**  
+1 (310) 592 7086  
Producer



## “Einstein’s God Model” hits the West Coast at the Silver Scream Film Festival

*For thousands of years, only religion has offered an answer to what happens after death. Science is about to add another dimension.*

**LOS ANGELES (February, 2016):** Einstein's God Model “sold out” at the Boston Sci-Fi Film Festival and was awarded "Best Science" prize by a judge from M.I.T.. Also, a local Harvard physics professor in attendance, excitedly confirmed the film's accuracy (and threatened to quit his day job to join the God Model Project!). The film is enjoying a popular festival response, so please join us at the Silver Scream Film Festival on Saturday, March 5th at 7:30pm in Santa Rosa, CA at the Roxy 14 theaters.

This independent feature film uses the science of Quantum Physics and String Theory to take us on a journey beyond the known universe. Director Philip T. Johnson uses love as the ultimate connection compelling his main character, Brayden, to fearlessly trust strangers who logically explain how to make his exploration of the multiverse possible.

Einstein’s God Model brings together actual inventions of Edison and the scientific theories of Einstein to portray multiverse theory as never before. In October 1920, Scientific American Magazine published an interview with Thomas Edison, wherein he revealed he was working on a physical device to speak with the dead. Rumors speculate he built a prototype and generations of scientists have continued to work on it. In the film, a secret society of physicists are using the device to explore the outer edges of Einstein’s claimed “God Model”, which maps out parts of the universe we have yet to understand.

Mr. Johnson, the Director of Einstein’s God Model, states "Our dream to present advanced physics theories in an accessible and thrilling way has been a great success for STEAM (Science Tech Engineering Art and Math) geeks and civilian theater goers alike!"

The film has enjoyed diverse talent and contributors who are as equally attracted to storytelling as they are to the science that makes this story plausible. Kenneth Hughes (Dr. Louis Mastenbrook) is a voice for independent filmmaking and acting on the festival scene. He has an extensive acting and producing career, working with such luminaries as Michael Bay, Meryl Streep, Eric Stoltz, Val Kilmer, Kevin Richardson, and Tracy Ullman. Kenneth brought in a deep bench of Hollywood talent to create a powerful post-production team. The film's amazing score was composed by Senon Williams of the immensely popular band "Dengue Fever" - a darling of public radio. Erik Tillmans of Dreamworks supervised the film's groundbreaking visual effects.

Naaman Haynes supervised the creation of the film's otherworldly soundscape and mixed the film's sound at the legendary Technicolor sound studios on the Paramount lot in Hollywood.

Craig Dow, Producer/Director for Imageworks Chicago, Inc. has over 20 years of experience and has worked with such artists as Gary Sinise, Jane Seymour and Kristin Chenoweth. He has also wrapped production on "Confessions of a Teenage Jesus Jerk" directed by Eric Stoltz.

Some cast members came from Chicago's Second City Theater, including Brad Norman (Craig Leeham) and Darryl Warren (Dr. Carl Meiselhoff). The film also had involvement from The Discovery Channel's, Mike Turrano as the Director of Photography.

The Director, Philip T Johnson, practices in the field of Anesthesiology as well, leveraging his knowledge of conscious states in the film. He also attended the NYU intensive film program.

In addition to winning an award at the Boston Science Fiction Film Festival, Einstein's God Model won a Remi at the Houston WorldFest.

More information and updates can be accessed via iOS, Android and the web at:

- Website <http://www.einsteinsgodmodel.com/index.html>
- Facebook <https://www.facebook.com/einsteinsgodmodelmovie>
- Twitter [@EinsteinsGodMod](https://twitter.com/EinsteinsGodMod)
- Trailer <https://vimeo.com/153329414>

###

**Media Contact:**

Kenneth Hughes  
323-871-2871  
[hughesartsandscience@gmail.com](mailto:hughesartsandscience@gmail.com)

###

**About:**

Induction Productions, LLC, Imageworks Chicago, Inc. and Trees of Shade, Inc. each are production houses associated with the film.

**Other facts:** To ensure scientific accuracy, the film had physics professor Daniel Record (a veteran of the Apollo program, Teacher in Space candidate, and a Presidential National Teacher award winner) consulting. Dr. William Rosenblatt, a prominent anesthesiologist at Yale University, contributed as the medical consultant.

**From:** [Corby Hines](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Regarding Proposed Fees on the Sonoma Coast  
**Date:** Friday, February 26, 2016 5:57:37 PM

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To whom it may concern,

I have a visceral aversion to State Parks proposal to require payment to access the Sonoma Coast. The coast to me is sacred land.

I strongly oppose any attempts to hinder access or commodify this parkland. I had the opportunity to meet Bill Kortum before he died, the organizer of the initial people's movement to preserve access to the coastline of Sonoma County. It's an insult to his memory to require payment to simply watch the sunset, go for a surf, or walk the Kortum Trail. This is the people's land, and if State Parks can't manage it in alignment with the will of the people and in accordance with the Coastal Act, then the land should be transferred to an organization that will promote access, not restrict it.

I implore you to vote NO on State Parks proposal to collect fees on the Sonoma Coast.

Sincerely,

Corby Hines  
Occidental, CA

**From:** [Corby Hines](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Regarding Proposed Fees on the Sonoma Coast  
**Date:** Friday, February 26, 2016 5:57:37 PM

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I strongly oppose any attempts to hinder access or commodify this parkland. I had the opportunity to meet Bill Kortum before he died, the organizer of the initial people's movement to preserve access to the coastline of Sonoma County. It's an insult to his memory to require payment to simply watch the sunset, go for a surf, or walk the Kortum Trail. This is the people's land, and if State Parks can't manage it in alignment with the will of the people and in accordance with the Coastal Act, then the land should be transferred to an organization that will promote access, not restrict it.

I implore you to vote NO on State Parks proposal to collect fees on the Sonoma Coast.

Sincerely,

Corby Hines  
Occidental, CA

**From:** [John Pepe](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [john pepe](#)  
**Subject:** Please Keep Our Coast Free and Accessible  
**Date:** Saturday, February 27, 2016 1:24:20 PM

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Keep coastal access free. Ask for voluntary payments by visitors at locations throughout existing parks. Mandatory fees are offensive and illegal.

California has a legacy of beautiful and exclusive coastline. It is the domain of the people of California. The 1976 California Coastal Act ensures maximum public access and reinforces that concept throughout its text. Free coastal access is a constitutional right we can be proud of.

California State Parks are already public property and vastly supported by the monies and taxes of the people collected by the state in various ways. It is incumbent of the state to keep the California coast accessible to its citizens and any visitors to our state free of charge.

I don't even see a voluntary payment collection system at the coastal areas my family frequents often; we spend the day there at least 15 times per year probably more. I would happily pay several dollars with each visit if there was a way for me to do that. I will resent having to pay \$8 for each visit. The state will incur significant costs with additional personnel just to staff and support the proposed fee collections making it very difficult to raise additional money to pay for park infrastructure and services. Attendance will decrease reducing further the amounts collected.

**John Pepe**  
Winemaker  
Pech Merle Winery  
707-479-0174 m  
[john@pechmerlewinery.com](mailto:john@pechmerlewinery.com)

**From:** [Noreen](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Beach fees proposal  
**Date:** Sunday, February 28, 2016 8:58:10 AM

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Dear Members of the California Coastal Commission:

I am the former state Senator for the North Coast of California, including the Sonoma Coast. I also represented much of Sonoma County in the State Assembly from 2004-2010. Prior to 2004 I served on the Santa Rosa City Council for 8 years. I write to protest the Department of Parks and Recreation (DPR) proposal to charge fees at several of our local state beaches. Here are some points I would like you to consider, in no particular order:

- Please consider the history of fee proposals at our Sonoma Coast beaches. DPR attempted to charge fees at several local beaches in the early 1990s. The project was a disaster. Public opposition was so strong DPR eventually backed down and removed the pay stations.
- Bodega Head is where the movement to preserve California's coast began. The symbolic, historic and emotional value of Bodega Head is immeasurable. Charging fees here is not only in violation of the Coastal Act guarantee of access to the coast, it violates the very spirit of California's coastal protection ethic.
- Willow Creek is not a beach and merits separate consideration.
- Sonoma County is moving quickly to stop charging fees at beaches it operates. State beaches should be consistent.
- This entire process lacks transparency. The public feels it is not being heard. DPR held no scoping meetings and no public hearings. DPR convened a group of private local "stakeholders" to discuss its proposal. The public was not invited. The public meeting held in Sebastopol on 2/17/16 was a disaster and left hundreds of people frustrated and angry because DPR refused to take public comment. Couple this with the recent removal of Dr. Lester as Executive Director of the Coastal Commission over widespread public opposition, and one can easily see why the public feels it is being excluded from this process. CEQA and the Coastal Act demand a better process which engages the public. Now we hear the Coastal Commission may not hear this proposal at its April meeting in Santa Rosa and may reschedule the hearing for a later date at some other location. I urge you to hear this proposal somewhere in Sonoma County, whether at the April meeting or at some other time.
- Charging fees at beaches, particularly beaches such as Bodega Head which are important historic places, will reduce access for low-income individuals and families.
- One of the obvious consequences of charging entrance fees at state beaches is that the public will park on Highway 1. That is an environmental impact which cannot be mitigated. Cars parked along Highway 1, which is narrow, winding, and lacks shoulders, pose a safety hazard for other drivers and pedestrians. It will also cause visual impacts which cannot be reduced or mitigated.
- State parks along the North Coast have been subjected in recent years to funding cuts, closures, staff cuts, reductions in hours and services, and partial closures. Many of our parks have a lengthy backlog of needed improvements, upgrades, and maintenance projects. Many of our parks are now operated by non-profit organizations which must rely on contributions from the local community. Our community feels our state parks have been underserved or neglected for many years and this fee proposal adds insult to injury. We know the fees collected will not be used to improve services at our local parks, but will be used to support parks around the state, including parks which have much better services than we enjoy at our local parks. As a result, the public feels this fee proposal is a means to produce revenue for the state and has no nexus to the services provided at the parks producing the revenues or even the parks within our region.
- Many questions remain unanswered. Among them are, how much revenue will be produced? How much will it cost to install, operate, staff and maintain the fee-collection facilities? How much, if any, of the revenue produced will be used to operate and maintain local state parks? How did DPR determine the cost to operate and maintain local state beaches?

Thank you for your consideration,  
Noreen Evans

**From:** [Jennifer Wheeler](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Free Beach Access  
**Date:** Sunday, February 28, 2016 11:26:36 AM

---

Dear Coastal Commissioners,

I am 64 years old and have been going to beaches in California for over 50 years. The beach is my refuge. It is where I go to restore my faith in life, ponder the great mysteries of this world and to forget my worries, problems, and sufferings.

I believe we all need an unfettered place to do these things. To have to pay to get on a beach will undo the very thing we go out there for. Might as well make a baby pay to be born, force a mountain lion to pay to eat a deer, charge the sun for rising. We have an inalienable birthright, as a living being on this planet to be able to have places to go where we don't have to pay just to see and visit them. The ocean is our birthright as living beings on the planet and it is sacrilegious, unjust and just plain wrong to force people to pay to walk on the sand, go in the ocean, and breathe the salt air.

When the coastal act was put in place, it was necessary because development was taking away access to beaches. By charging money, State Parks is doing the very thing that the Coastal Act was created to prevent. The spirit of the law is to provide unfettered access to our coast. By charging to access the beach, State Parks is putting up a barrier to the coast.

I disagree with the premise that special groups should be given reduced fees or free access. The ocean is there for us all and to start saying this one or that one can have reduced or free payment sets up an unfair and unjust system. It says that the state controls who gets to go onto the beach. It goes against the law that there should be access to the coast for **all the people**. In fact, no beach presently charging should be doing so. All beaches now charging fees need to be freed. We pay taxes and I want my taxes to support free access to all beaches. I am sure there are other ways to get money for state parks, but charging to get your feet wet at the beach is not one of them.

Jennifer Wheeler  
740 Elm Drive

Petaluma, California 94952  
kismet52@msn.com

CALIFORNIA CONSTITUTION  
ARTICLE 10 WATER

SEC. 4. No individual, partnership, or corporation, claiming or

possessing the frontage or tidal lands of a harbor, bay, inlet, estuary, or other navigable water in this State, **shall be permitted to exclude the right of way to such water** whenever it is required for any public purpose, nor to destroy or obstruct the free navigation of such water; and the Legislature shall enact such laws as will give the most liberal construction to this provision, so that access to the navigable waters of this State shall be always attainable for the people thereof.

## Article 2. Public Access

### Section 30210.

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided **FOR ALL THE PEOPLE** consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

### **We Are Tied to the Ocean**

**"It is an interesting biological fact that all of us have in our veins the exact same percentage of salt in our blood that exists in the ocean, and therefore, we have salt in our blood, in our sweat, in our tears.**

**We are tied to the ocean. And when we go back to the sea--whether it is to sail or to watch it--we are going back from whence we came."**

**- John F. Kennedy**

### **A Gift From the Sea**

**"The sea does not reward those who are too anxious, too greedy, or too impatient. One should lie empty, open, choiceless as a beach--waiting for a gift from the sea."**

**- Anne Morrow Lindbergh**

### **Sea Air Is Like a Quieting Thought**

**"I could never stay long enough on the shore; the tang of the untainted, fresh, and free sea air was like a cool, quieting thought."**

**- Helen Keller**

**Let the Sea Cleanse You**

"When anxious, uneasy and bad thoughts come, I go to the sea, and the sea drowns them out with its great wide sounds, cleanses me with its noise, and imposes a rhythm upon everything in me that is bewildered and confused."

**- Rainer Maria Rilke**

**From:** [Erin Axelrod](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** Sonoma Coast Fee input  
**Date:** Sunday, February 28, 2016 9:09:49 PM

---

Dear Coastal Commission,

As a 28+ year resident of Sonoma County, who is an active user of the coast and who sustainably stewards this beautiful land through sustainable harvesting of seaweed and fungi, I strongly support a public process for expressing opinions, issues of concern and to satisfy CEQA. For this reason, I appreciate the opportunity provided by the Coastal Commission staff to hear the public's views. I also applaud the efforts by local State Park Superintendent Mike Lair and Environmental Scientist Brendan O'Neil for holding a series of stakeholder meetings to make recommendations that addressed many community issues. Their efforts resulted in a reduction of proposed fee locations and did remove locations that have very few services and present parking and safety issues.

I also am an advocate for a sustainable funding source to adequately support our struggling State Park system. Such a funding source would **alleviate the need for new fees**. Since park closures and service reductions became a reality, Stewards of the Coast and redwoods, a local NGO, stepped up to operate Austin Creek SRA and has also been paying to keep the Visitor Center and public restrooms open in Jenner. Our local park management staff are gradually reopening service reduction areas but this doesn't mean there still isn't a strain on the limited staff resources that are available for maintaining these coastal facilities.

I appreciate legislators, like Senator McGuire who are proponents of using tax revenue from the eventual sale of legal marijuana to fund State Parks. It makes sense considering the damage done by illegal pot grows on public lands and what it has done to our natural resources in places like Austin Creek SRA and Salt Point SP.

**I would encourage the Coastal Commission to delay their decision for new Sonoma Coast fees until this proposal has a chance to become the new funding source for our State Parks.**

State Parks has provided no assurance that pocket beaches will not continue to be subjected to seasonal or total closures even with new fees imposed at neighboring beaches.

I do not support the transition of State Parks into a regressive based pay to play business model where those with the least income pay the largest percentage of their income to access public lands. Instead of fees we need some progressive legislation that generates sorely needed revenue for our Parks.

**MOST IMPORTANTLY:** This decision sets Statewide precedent: ...what happens here will subsequently happen from the Oregon to Mexico border where gravel, non ADA compliant lots with a maximum of pit toilets and seasonal trash collection will be fee'd. This strongly concerns me.

Please do what is best for the majority of the users of these beautiful state parks, and do not allow the weight of funding fall on the shoulders of single-pay users, but

it is the responsibility for our leaders and legislators to produce comprehensive regulatory reform to find new ways of funding state parks.

Thank you!

Erin Axelrod  
Partner, LIFT Business Design  
@erinaxelrod  
[erin@lifteconomy.com](mailto:erin@lifteconomy.com)  
707.332.1967

"It is amazing what you can accomplish if you do not care who gets the credit."  
- Harry Truman

**From:** [Daniela Herman](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma Coast Fee input  
**Date:** Sunday, February 28, 2016 10:37:52 PM

---

Dear Coastal Commission,

As a lifelong resident of Sonoma County, who is an active user of the coast and who sustainably stewards this beautiful land through sustainable harvesting of seaweed and fungi, I strongly support a public process for expressing opinions, issues of concern and to satisfy CEQA. For this reason, I appreciate the opportunity provided by the Coastal Commission staff to hear the public's views. I also applaud the efforts by local State Park Superintendent Mike Lair and Environmental Scientist Brendan O'Neil for holding a series of stakeholder meetings to make recommendations that addressed many community issues. Their efforts resulted in a reduction of proposed fee locations and did remove locations that have very few services and present parking and safety issues.

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**I would encourage the Coastal Commission to delay their decision for new Sonoma Coast fees until this proposal has a chance to become the new funding source for our State Parks.**

State Parks has provided no assurance that pocket beaches will not continue to be subjected to seasonal or total closures even with new fees imposed at neighboring beaches.

I do not support the transition of State Parks into a regressive based pay to play business model where those with the least income pay the largest percentage of their income to access public lands. Instead of fees we need some progressive legislation that generates sorely needed revenue for our Parks.

**MOST IMPORTANTLY:** This decision sets Statewide precedent: ...what happens here will subsequently happen from the Oregon to Mexico border where gravel, non ADA compliant lots with a maximum of pit toilets and seasonal trash collection will be fee'd. This strongly concerns me.

Please do what is best for the majority of the users of these beautiful state parks, and do not allow the weight of funding fall on the shoulders of single-pay users, but it is the responsibility for our leaders and legislators to produce comprehensive

regulatory reform to find new ways of funding state parks.

Thank you for your time and work,

Daniela Herman

Sent from my iPhone

**From:** [Mikki Herman](mailto:Mikki.Herman)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** NO FEES AT CA BEACHES  
**Date:** Monday, February 29, 2016 7:03:53 AM

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Those It May Concern,

The coast is a culture unto itself. It's a place for a moment alone, a place for a family day, a place to surf for a couple hours, to fish, to gather seaweed, to run for an hour in the evening, to hold hands with someone and watch the sunset... The idea that a casual trip to the beach will now include a fee, suppressing some people in this State from ever going or going infrequently is an extreme solution to a problem which could easily be solved differently. Access to a beach is not the same as deciding to visit a state forest or desert and the Coastal Commission should not delude itself that it's just another large State Park in need of a fee. Senator Mike McGuire proposes using tax revenue from the sale of legal marijuana to fund State Parks. This is an excellent source of the funding. The Coastal Commission needs to delay their decision for new Sonoma Coast fees until there has been an opportunity to look at new funding sources for our State Parks.

Sincerely,  
Mikki Herman  
PO Box 204  
Guerneville, CA 95446

**From:** [talía herman](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Please don't charge a fee to go to our beaches  
**Date:** Monday, February 29, 2016 7:37:05 AM

---

To whom it may concern,

The coast is a culture unto itself. It's a place for a moment alone, a place for a family day, a place to surf for a couple hours, to fish, to gather seaweed, to run for an hour in the evening, to hold hands with someone and watch the sunset... The idea that a casual trip to the beach will now include a fee, suppressing some people in this State from ever going or going infrequently is an extreme solution to a problem which could easily be solved differently. Access to a beach is not the same as deciding to visit a state forest or desert and the Coastal Commission should not delude itself that it's just another large State Park in need of a fee. Senator Mike McGuire proposes using tax revenue from the sale of legal marijuana to fund State Parks. This is an excellent source of the funding. The Coastal Commission needs to delay their decision for new Sonoma Coast fees until there has been an opportunity to look at new funding sources for our State Parks.

Sincerely,

Talia Herman

Sent from my iPhone

**From:** [Erica Brown](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Keep our State Beaches Free  
**Date:** Monday, February 29, 2016 8:14:29 AM

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Thanks,  
Erica Brown  
Public Relations and Logistics



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**From:** [Lev Woolf](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** Please Do Not  
**Date:** Monday, February 29, 2016 9:08:35 AM

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I'm sorry it has come to this. We must stop trying to milk everything good in our little society, for money.

Please do not allow this measure to go through. Follow a higher ethic in allowing the coast to be accessible for all, and not a financially gated or elite place of seclusion.

The coast is a culture unto itself. It's a place for a moment alone, a place for a family day, a place to surf for a couple hours, to fish, to gather seaweed, to run for an hour in the evening, to hold hands with someone and watch the sunset... The idea that a casual trip to the beach will now include a fee, suppressing some people in this State from ever going or going infrequently is an extreme solution to a problem which could easily be solved differently. Access to a beach is not the same as deciding to visit a state forest or desert and the Coastal Commission should not delude itself that it's just another large State Park in need of a fee. Senator Mike McGuire proposes using tax revenue from the sale of legal marijuana to fund State Parks. This is an excellent source of the funding. The Coastal Commission needs to delay their decision for new Sonoma Coast fees until there has been an opportunity to look at new funding sources for our State Parks.

I trust you will do the right thing, in this case the conservative thing, and refrain from seeking to gain more money for something humans have enjoyed for over 11,000 years.

Thank you

- Lev Woolf

**From:** [Jim@jimthornburg.com](mailto:Jim@jimthornburg.com)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma Coast access  
**Date:** Monday, February 29, 2016 9:16:05 AM

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To whom it concerns,

As a long time visitor to the Sonoma Coast, I am writing to voice my opposition to the proposed new pay kiosks on the Sonoma Coast.

In all my years of visiting (30+ years on a weekly basis) the free areas on the Sonoma Coastline, I have yet to see a problem with the current system of (mostly) free access. I've seen almost no problems with trash, human waste or vandalism. I personally have seen no problems with parking or overcrowding or crime. In short, I've seen no problems that the pay kiosks and reduced access will solve.

The minor problems I have seen have been addressed and solved not by State Parks, but rather by concerned locals who have organized clean-ups or worked to better define existing trails.

It seems very clear that the new pay-for-access kiosks are simply a corrupt way for State Parks to raise more money for itself. Please correct me if I'm wrong, but it is my understanding that the money raised by the kiosks does not go back to Sonoma Coast Parks (that makes sense since the coastline is clearly doing fine under the current budget), but instead goes to a general fund for State Parks?

Clearly, that's not fair to the visitors and citizen-stewards of the Sonoma Coast.

Please, do the right thing and leave the people's coastline alone. Until the people prove they can't be trusted to be good stewards of this coastline, there is absolutely no need for more State Park presence and fees!

Sincerely,  
Jim Thornburg

**From:** [LoisB226@comcast.net](mailto:LoisB226@comcast.net)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma Coast Fee input  
**Date:** Monday, February 29, 2016 10:02:28 AM

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February 29, 2016

Re: Fees for Sonoma Coast

Dear Sirs;

Wrights Beach and The Dunes State Beach are two beaches with entrance fees, and are just not even places I consider going. They are just off the list, and out of my mind of choices. I have not been to either in more years than I can remember. And this is an example of what fees do to the concept of free access to the ocean.

I have been a docent for Whale Watch for 22 years, and have a pass, but that will end soon as my body, at 73, is challenged with pain standing out on the rocks for hours. And I am deeply saddened, and even worried about how my life will change without the emotional relief the ocean gives me, especially at Shell Beach and Bodega Head, both places I can watch the ocean from easily. The day use fees will make these two or three visits a week a challenge to my retirement funds.

Charging fees will put incredible numbers of cars parking along Hwy 1. I go to Foothill Co Park in Santa Rosa, and counted 18 cars one day this week, parked along the residential street, instead of inside the park, and this is a small park. The additional cars clogging Hwy 1 access will be incredible. It is hard to drive along Hwy 1 traffic anyway, without the addition of added cars parking that refuse to pay the fee. I have the feeling that the people on the board making this decision have not bothered to be here on a sunny Sunday afternoon to try to drive along Hwy 1 to experience this themselves.

Some of the comments from the meetings show a lack of connection to or understanding of conditions here. The question of how many have worked the 200 hours to get a state pass, when our seasons to volunteer are too short for that to be possible, is an example. The

coming in with fees for access, changes lives of people who have moved here with desire to be next to the ocean, not next to a place to have to pay to park. The businesses I was told were not notified of the meetings. The inability to show figures for the costs of building and manning three sites, vs the income, plus the inability to assure us that our money will support more than the general fund, something none of us can trust, is a real sign this is just looked at as a money grab.

Please reconsider this decision to charge at these beaches, especially after the Sonoma County Board of Supervisors voted this down 5 to nothing. Like what does our work getting all the signatures, and the unanimous backing of the county mean?

Lois Benson  
4890 Londonberry Dr  
Santa Rosa CA 95403

**From:** [Carly Lynne Nacmanie](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma County Coastal Access Proposal  
**Date:** Monday, February 29, 2016 10:41:36 AM

---

Dear Sonoma State Parks,

Please do not allow this measure to go through. Follow a higher ethic in allowing the coast to be accessible for all, and not a financially gated or elite place of seclusion.

The coast is a culture unto itself. It's a place for a moment alone, a place for a family day, a place to surf for a couple hours, to fish, to gather seaweed, to run for an hour in the evening, to hold hands with someone and watch the sunset...

The idea that a casual trip to the beach will now include a fee, suppressing some people in this State from ever going or going infrequently is an extreme solution to a problem which could easily be solved differently. Access to a beach, to nature, should not require a fee.

Senator Mike McGuire proposes using tax revenue from the sale of legal marijuana to fund State Parks. This is an excellent source of the funding. The Coastal Commission needs to delay their decision for new Sonoma Coast fees until there has been an opportunity to look at new funding sources for our State Parks.

I trust you will do the right thing and refrain from seeking to gain more money for something to which all humans should have equal access.

Thank you.

Sincerely,

Carly L. Nacmanie



Director at [harmonygrows.com](http://harmonygrows.com)  
[Piano, Voice & Woodwind Teacher](#)  
[Music Educator](#)

**From:** [Kate Lundquist](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Stop proposal to charge for Sonoma coast beach access!  
**Date:** Monday, February 29, 2016 11:23:39 AM

---

Dear California Coastal Commissioners,

As a resident of the Sonoma coast for the past 18 years I am deeply troubled by the proposal to start charging for access to important coastal portions of our public trust. The coast has become the final frontier for those with limited incomes to access freely. I understand there are costs associated with maintaining signage, parking lots and steps to these areas and believe there are better ways to raise those funds.

Charging for access to Shell Beach, Stump Beach, Bodega Head, Willow Creek and Goat Rock disproportionately impacts those that use those areas. There have been no analyses of what these impacts may be. I personally am on a limited income and visit all of those areas regularly and would have to avoid them during those lean times of the month. I implore you to reconsider this proposal and find better ways to cover the budget it takes to maintain these areas.

Sincerely,

Kate Lundquist  
19100 Coleman Valley Road  
Occidental, CA 95465

**From:** [Jane McDonough](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** No fees for coastal access!  
**Date:** Monday, February 29, 2016 12:10:35 PM

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The idea that a casual trip to the beach will now include a fee, suppressing some people in this State from ever going or going infrequently is an extreme solution to a problem which could easily be solved differently. Access to a beach is not the same as deciding to visit a state forest or desert and the Coastal Commission should not delude itself that it's just another large State Park in need of a fee. Senator Mike McGuire proposes using tax revenue from the sale of legal marijuana to fund State Parks. This is an excellent source of the funding. The Coastal Commission needs to delay their decision for new Sonoma Coast fees until there has been an opportunity to look at new funding sources for our State Parks.

**From:** [Richard Charter](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** Oppose State Parks Beach Fees on Sonoma Coast, comment letter  
**Date:** Monday, February 29, 2016 12:26:48 PM  
**Attachments:** [StateParksFeesCCCToFfinal1.pdf](#)  
**Importance:** High

---

Dear Commissioners:

As a forty-year resident of the Sonoma Coast, I am submitting the attached comments in opposition to the flawed proposal by California State Parks to impose new access fees at Goat Rock, Stump Beach, Willow Creek, and Bodega Head.

Thank you for this opportunity to comment.

Richard Charter

--  
\*\*\*\*\*

Richard Charter  
Senior Fellow  
The Ocean Foundation  
707 875-2345  
707 875-3482

\*\*\*\*\*

email: [waterway@monitor.net](mailto:waterway@monitor.net)



## THE OCEAN FOUNDATION

COASTAL COORDINATION PROGRAM

February 29, 2016

California Coastal Commission  
45 Fremont Street #2000  
San Francisco, CA 94105

Via email to: [SonomaStateParksAppeal@Coastal.CA.gov](mailto:SonomaStateParksAppeal@Coastal.CA.gov)

### **Re: Please Oppose State Park Beach Fees on the Sonoma Coast**

Dear Commissioners:

Thank you for this opportunity to comment on the pending appeal related to California State Parks' attempt to impose new entry fees to unimproved day use gravel parking lots on the Sonoma Coast.

Taken in context, it is important to remember that the Bodega Head Nuclear Power Plant was the epicenter of one of the iconic battles that started the modern day conservation movement, and the entire Jenner estuary adjacent to Goat Rock was once supposed to be dredged and the gravel then hauled away by barge to build the Bay Area Rapid Transit system. Protracted organized opposition by the public stopped both of these inappropriate proposals and then public money was used to purchase both locations and put them into the State Park system so that similar future threats of coastal industrialization would not arise.

Public funding was also used to purchase other parklands along the Sonoma Coast, during several different time periods.

The efforts of a group called Citizens Organized to Acquire Access to State Tidelands, or COAAST, started out to prevent a proposed private subdivision at Sea Ranch from completely blocking public access to the spectacular coast there, and those grassroots efforts in turn snowballed into a statewide public campaign leading to the passage of Proposition 20 and the creation of the Coastal Act and the Coastal Commission. This was the last ballot measure in California to have an all-volunteer public collection of the necessary signatures to qualify the item for the ballot.

In light of these underlying events, it is easy to see why the public is now wondering why, in the lingering wake of an embarrassing scandal over fiscal malfeasance by the higher-ups at California State Parks, the public would now be expected by State Parks to pay for simple unimproved day use with portable toilets and gravel parking lots on lands that the public purchased for State Parks. The public saved these places, then bought the land and put it into State Parks, then passed the Coastal Initiative to ensure their access to these lands in perpetuity, so it seems obvious why the public now cannot understand why they are supposed to pay to go look at them.

Some key points on the State Parks proposal now at hand:

- (1) State Parks has not even considered that there will inevitably be displacement of large numbers of coastal visitors from proposed new pay sites to already-overcrowded sites elsewhere on the Sonoma Coast, exceeding all available spaces in capacity-limited parking lots and the ability of other sites to safely accommodate these newly-displaced visitors without damage to public trust resources.
- (2) State Parks' new fee proposal will unfairly result in substantially diminished coastal access by low-income visitors, by minorities, and by those in need of ADA access.
- (3) State Parks has failed to comply with CEQA requirements for a full analysis of cumulative impacts and proposed mitigations for their proposed new policies and fee-collection installations. The State Parks proposal is missing the required EIR that needs to fully disclose the extent of, and secondary impacts from, the presently-proposed Parks fee plan. No requisite "Scoping" process has been conducted, and no Tribal consultation process has been initiated.
- (4) State Parks has failed to quantify the inevitable loss of revenues to local coastal businesses if Park access fees are implemented as proposed.
- (5) Reputable studies of the type of fee-collection devices now being proposed by State Parks for the Sonoma Coast caution that such machines should not be deployed in any area prone to vandalism, a common night-time occurrence at unpatrolled locations along the Sonoma Coast for decades.
- (6) State Parks' fee proposal is inevitably going to result in illegal roadside parking on sensitive vegetation, trammeling of sensitive ESHA habitats, and an unpreventable intrusion of new cross-country pedestrian trails through wetlands and unstable soils as frustrated visitors proceed to access long-accustomed beaches and headlands on foot.
- (7) State Parks has failed to offer any prospective mitigations for their proposed new entry stations and fee-collection devices on the inevitable blockage of traffic flows on public roadways in an area plagued during many Holiday weekends with stopped traffic

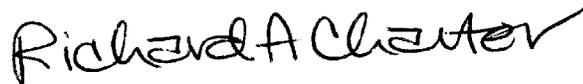
backups that already extend for miles and last for hours. Inevitable increases in emergency response time for public safety agencies along the coast need to be considered as part of comprehensive traffic planning by State Parks before further obstacles and impediments to traffic flow are arbitrarily put in place.

- (8) State Parks has failed to consider the impact of that agency's removal of trash receptacles and permanent closure of restrooms and the resulting effect of such closures on nearby beaches and natural ESHA areas identified in the Sonoma County LCP at Duncans Landing and elsewhere.

Please support the County of Sonoma's adopted concerns and oppose State Parks' fee proposal.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Richard A Charter". The signature is written in a cursive, slightly slanted style.

Richard Charter  
Senior Fellow  
The Ocean Foundation

**From:** [clausenmarcy@aol.com](mailto:clausenmarcy@aol.com)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma Coast Fee input  
**Date:** Monday, February 29, 2016 7:11:28 PM

---

Dear Sirs :

I support state parks and frequently visit and camp , especially in Sonoma County. I support a fee that will cover costs and maintain services and keep our parks open. I Most importantly, we need a stable funding source for state parks, such as Oregon's separate trust fund, and hope this will be considered soon. There needs to be ample and easy opportunities for public input to this process.

Marcy Clausen

5044 Deerwood Drive, santa Rosa , Ca. 95403

**From:** [Connie Bowen](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Please  
**Date:** Monday, February 29, 2016 10:09:50 PM

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no fees for the Sonoma County beaches...it is unthinkable that the beaches would not be free to all.  
Connie Bowen

**From:** [Lisa Love](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Free Beach Access Please  
**Date:** Monday, February 29, 2016 10:20:30 PM

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Greetings,

I am a low income mother of three kids. I can only afford the gas money from Sebastopol to the coast once every month or two. Their favorite beach is Doran but we never go because I don't have the extra dollars for parking. Instead we visit Bodega Head & Goat Rock. Please keep them free. We don't get to have many fun experiences.

Lisa Olson

**From:** [Constance Miles](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** having to pay to play on the coast  
**Date:** Tuesday, March 01, 2016 6:13:02 AM

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To Whom It May Concern,

I oppose the idea of folks having to pay for beach access. This should be free to everyone - regardless of socio-economic status. Charging would inhibit access to folks who can't afford it, to families who have a joyous time together out in nature and may live in the city, with little open land nearby. It would limit access to seniors, to immigrants, to the disabled, to all folks with a limited income, where food needs must come before recreational expenses. Everyone has a right to enjoy the ocean, the beach, the magnificence of our Sonoma County coast.

Please don't let fees be charged for coastal access.

Thank you.

Sincerely,

Constance Miles

**From:** [Theresa Seaton](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** No beach fees!  
**Date:** Tuesday, March 01, 2016 6:27:04 AM

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Our basic rights are free access to our beautiful coast as God intended!!NO BEACH FEES!

Sent from my iPhone

**From:** [NORMA JELLISON](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma Coast State Parks Fee Proposal Appeal  
**Date:** Tuesday, March 01, 2016 8:42:56 AM  
**Attachments:** [Sonoma Coast State Park Fees Appeal CCC on Ltrhd March 2016.doc](#)

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Nancy et al-

Attached is my comment letter.  
I am sending it by US Mail as well.

Thank you for your efforts in this regard.

Sincerely,

Norma Jellison

*Norma*

*A new ethic for the ocean where the ocean is not seen as a commodity we own but as a community of which we are a part.*

*The sea is worth saving for its own sake. Bill Ballantine NZ*

And take this to the land as well.

NORMA L JELLISON



P O BOX 1636 ◆ BODEGA BAY, CA 94923  
Home Phone/Fax (707) 875-3799  
NORMALJ@SONIC.NET

March 1, 2016

California Coastal Commission  
45 Fremont St #2000  
San Francisco CA 94105

[SonomaStateParksAppeal@Coastal.CA.gov](mailto:SonomaStateParksAppeal@Coastal.CA.gov)

RE: Sonoma State Parks Appeal

Chair Kinsey and Commissioners:

Two sections of the Coastal Act are critical considerations regarding the fee proposal before you for the Sonoma Coast State Parks. The first, Section 30210 Access, in fact refers to the California Constitution - Article X Section 4 of the California Constitution. Section 4 of the California Constitution not only precludes the exclusion of the right of way to tidal lands for public purposes, it directs the Legislature to enact laws that give the most liberal construction to the section so that access to the navigable waters of the State are always attainable for the people. Section 30210 of the Coastal Acts says in carrying out Section 4 of the California Constitution "...maximum access shall be conspicuously posted and recreational opportunities shall be provided *for all the people*... ". (emphasis added)

A second relevant section of the Coastal Act is Section 30213, which requires lower cost visitor and recreational facilities be protected, encouraged and where feasible, provided.

I point out these 2 sections of the California Coastal Act in particular as they have much relevance to this fee proposal. At its heart, the fee proposal is an impediment to access to tidal lands - the coast, our California commons, and is a social justice issue.

Sonoma County beaches provide free access to the ocean and the out of doors for a large population that depends on free access to recreational opportunities. Collecting fees has an oversized burden for these Environmental Justice Communities of Concern.

The \$3/hour; \$8/day fee proposed will disproportionately impact low income communities in Sonoma County. Many who live along the lower Russian River are low income, fixed income individuals, including many senior citizens, who go to the beach and/or walk the Kortum Trail as their only affordable recreation.

Both access points to the Kortum Trail, named in honor of Bill Kortum's dedication to unimpeded coastal access, would ironically be fee access only. Goat Rock State Beach and the Kortum Trail are the most direct; accessible coastal access points for those who live along the lower Russian River and well as for thousands of Californians who travel to the coast from inland areas. For many, fees to access these Sonoma Coast State Parks areas would preclude their access to the coast.

Similarly, people of color; especially Latino families from the county's inland cities - Santa Rosa, Rohnert Park, Sonoma simply do not have the money to pay the access fees. They depend on access to the coast for a free outdoor experience. The Sonoma County coast is accessible only by motor vehicle - a half hour to one hour trip. There is no transit of consequence as Mendocino County Transit operates one trip per day north and one south between Santa Rosa and Mendocino. Thus, the cost of gas already poses a significant cost of access to the coast for these Environmental Justice Communities of Concern. Talk of "working to find

Unlike in Southern California, where transit is available to the beach and dense urban communities paralleling Route One provide multiple opportunities to park and easily walk to the beach to avoid parking fees, this is not the case along the Sonoma Coast. The inevitable avoidance of fee areas would result in overflow of the, for now, free pocket beach gravel parking lots. Parking on minimal shoulders and walking on the narrow, curvy two lane Highway One is dangerous. Even more dangerous, social trails down hazardous erodable cliffs would not only have negative impacts to ESHA areas on those coastal cliffs, falls and the inevitable cliff rescues would create an added burden for local fire and emergency response personnel.

The citizens of California saved the coast, their taxes purchased the land and put it into trust in the hands of State Parks, passing the Coastal Act, a citizen initiative, to protect the coast in perpetuity. To now ask the public to pay to access what they fought to protect access to is more than disconcerting. It is an affront.

We recognize there is a shortage of funding for California's parks. The pattern of dis-investment in Parks is long running. The portion of general fund monies supporting the State Park's budget has been halved in little over a decade.

As with prior governors, the Resources Agencies - State Parks in particular - have not been a priority in this governor's budgets. The recommendations of Parks Forward to turn parks over to the private sector or public private partnerships are short sighted.

State Parks are every bit as important state infrastructure as roads and bridges. Both bring economic vitality to the state. For every dollar that funds the parks, \$2.35 is returned to the state's General Fund through economic activities in the communities surrounding the parks.

It is time for the Legislature to reverse this dis-investment trend. And it is incumbent on the Coastal Commission to uphold the Coastal Act and guarantee access to the coast for all, regardless of social or economic status.

Efforts to "encourage" monthly free days on the weekend and a reasonably priced local pass are empty words. Asking for accountability for the monies collected and expenditures, in support of fees, are other empty words. Permit conditions in Southern California regarding collections and expenditures have not been adhered to by State Parks. No accounting has been forthcoming from State Parks in the 4 years since the Southern California permit was approved with those conditions.

Despite the fact that this fee proposal was in consideration for three years and a budget of potential income and expenditures was asked for by the Commission one year ago when the appeal first came before you, State Parks has yet to be able to answer simple questions about how much money they expect from the fee proposal, how much it will cost to implement and what the money might be spent on **if**, as suggested, it stays local. There is no reasonable expectation that any permit conditions enacted this time around, would be adhered to either.

I strongly urge you to turn down this fee proposal in its current form. The public process for something as precedent setting as this fee proposal has been virtually non existent, save for a meeting called by your Commission staff. This, after State Parks denied public comment to the hundred plus people who came out on a rainy nite, with one week advance notice, by calling the meeting they hosted an Open House.

The fee proposal sets a precedent of great import and impact because 2/3 of the California coast is owned by State Parks!

We have been told that State Parks will issue an Initial Study, likely before you take this matter up in April. State Parks staff further stated that the Initial Study is precedent to issuing a Mitigated Negative Declaration. This despite, in its appeal last April, it relied on PRC Section 30603 (a) (5) calling the project a major public works project. A rather amazing assertion that a IS/MND is now appropriate, lacking environmental assessment of the proposed major public works project to so determine. All without a Public Scoping meeting, which State Parks feels is unnecessary because of the MND.

There has been no real effort to identify funding avenues to overcome the need for regressive fees. A dedicated vehicle license fee funding sources for State Parks should be investigated. While that measure failed when first tried, the fee was too high and was rolled out at the on set of a recession. Similarly, some have suggested use of a portion of ORV set asides to fund State park operations. In short, there has been no effort to identify a better method to restore funding for the State Parks and the state beaches that belong to every Californian.

Please embrace your obligations to the Coastal Act to ensure access for all to the coast.

Please deny this fee proposal as inconsistent with the intent and meaning of the California Coastal Act.

Yours truly,

*Norma L Jellison*

Norma L Jellison

Bodega Bay Resident and Coastal Advocate

**From:** [Pat Westman](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Patty Westman](#)  
**Subject:** Sonoma Coast Fee input  
**Date:** Tuesday, March 01, 2016 5:09:31 PM

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Dear Coastal Commission,

I am writing to let you know that I strongly appose additional fees at any more beaches on the Sonoma Coast.

Although State Parks is in need of a larger budget, this proposal would most likely NOT make a dent in their budget shortfalls, and at the same time, would be a very bad idea for this county. Currently, we don't even know how fees at 6 additional "beach parks" would help state parks, because even after several years of pursuing this project, they still have not given the public or the contributing stakeholders any budget and revenue numbers.

My objections to the fee proposal are the following:

State Parks has not prepared the CEQA Initial Study, and therefore cannot address the environmental impact this fee proposal would have. Yet, at the 2/17/16 meeting in Sebastopol, DPR representatives said that a mitigated Negative Declaration will be prepared. That is like a researcher who writes the conclusion to a study without conducting the study! This is an unacceptable practice, and State Parks must be called out on this and required to comply with all CEQA rules and procedures before they move one step closer to charging fees.

Access to the beaches will be limited by imposing fees, and therefore will be in violation of the California Coastal Act. As you know, visitors to the Sonoma Coast must take a car to get there. Once there, the majority of the actual beaches require a strenuous walk up and down sand dunes or narrow, steep paths cut into the cliffs. Only a handful of beaches have an easier access. One is Doran Beach, which already charges a fee. The other is Goat Rock beach, now on the list for adding fees. By charging admission to visit Goat Rock beach, State Parks would be severely limiting actual beach access to the elderly, disabled, the very young, and just plain folks who might not be in the best physical condition. I can't even imagine the long lines to get in on a warm sunny day if they start charging fees. It will be backed up onto Highway 1. Have you ever seen the line of cars to get into Doran Beach on a nice day? That park gets full and closes shortly after 12:00 noon on a popular day. Goat Rock will be the same. So yes, people will pay the fee to go there, but it is not fair. You can't even swim at those beaches, the surf is too rough,

State Parks also wants to charge fees to enter tiny little Shell Beach. This small trail head on the Kortum Trail must remain open and free to everyone and anyone who cares to visit. By charging fees at both Shell Beach and Goat Rock, State Parks would have effectively limited access to most of the Kortum Trail. The only other parking area on the trail is a tiny gravel spit above (fee-based!) Wrights Beach. I can't help but think, what would the late Bill Kortum make of all of this? A man who

dedicated his life to stewardship of this coastline and who's legacy is the incredible and breathtaking Kortum Trail. This issue also is of great concern to the rock climbing groups who access Sunset Rocks via the trail. How very, very sad that Parks wants to charge admission for the public to use the trail. The parking lot at Shell Beach is so small you can't get more than a couple of dozen cars in there at one time. Would Parks be paving over part of the coastal prairie to help raise revenue? Who knows, because Parks has not come up with any explanations or details.

Bodega Head is a very special place, and possibly the birthplace of the American environmental movement, starting with anti-nuclear proponents. Thanks to the dedication and service for almost 10 years by many Sonoma County residents, they were successful in preventing the most egregious assault on the California coast by halting the construction of a nuclear power plant. Charging admission now for the sunset views, access to the headland trails, and access to the fisherman's memorial is an affront to humanity. Just because a place is popular does NOT make it ok to charge admission. State Park needs to show some respect.

Next of concern is public safety. Many people will try to avoid paying fees at all costs, and will park anywhere they can along Highway 1, on cliff edges, in resident's driveways. Walking along the highway poses great physical danger. Traffic flow will be impacted by more cars parked on the highway, fender benders will increase, and bicyclists will be put into even further danger.

In addition to the physical and property damage risks noted above, the delicate coastal environment is put at risk when people trample through prairies and dunes to get to the beach to avoid paying a fee. Wildflowers, native plants, nesting birds and other creatures will be displaced. These actions will also obstruct and spoil the incredible views that make our Sonoma Coast so very special.

Aside from denying beach access to those unable or unwilling to pay for parking, even if you are able to pay the admission price, there is no guarantee that the beach will be open. State Parks likes to put up iron gates at their fee beaches so they can control when people get to visit. Parks has not addressed what hours the beaches will be open, or if there will be iron gates blocking all of the fee beaches. A locked beach is the ultimate in limiting access. Here is an example. Last summer, my husband and I wanted to go surf fishing at Bodega Dunes State Beach, where a fee is already charged. After consulting the tide tables we determined that we should be at the beach before 7 am to take advantage of the tide coming in. When we got to the beach and paid our fee, we drove to the entrance and found that the beach was closed! Big iron gates blocked the driveway. We had to wait until almost 8:00 am for a park service employee to unlock the beach. Considering the budget problems parks has, I would envision many days of closed beaches due to staffing problems.

And some final thoughts. How will State Parks address future fees? Today the proposal is for \$8.00 per day. We KNOW that number will increase in time. And if this proposal goes forward, can Parks just add more parking lots, beaches, and cliff overlooks to the fee areas without another review? I am very nervous that Parks will also want to charge admission to the South Salmon Creek beach very soon. Will the self

service fee machines only accept credit and debit cards? How will Parks provide computer security to ensure that card numbers aren't stolen or hacked in the machines? What safeguards are in place? Will cash be accepted? Keep in mind that many low income people may not have credit or debit cards. Even people with cards might not be taking them to the beach. Who will be patrolling the parking lot every 15 minutes to ticket those who have over-stayed the "free" 15 minute visit or surf check? How will they know who is there for 15 minutes and who is there for a day without paying? Who issues the tickets?

Thank you for this opportunity to address these issues of great concern to me and my family. We moved to California a little over 6 years ago from the land-locked state of Wisconsin. Sonoma County became our 1st choice in location because it is on the ocean. We visited Bodega Bay the day after we arrived in the state, and have been going back 3-6 times every month. It is the most affordable activity in the Bay area for us 99%-ers. Please don't let State Parks take that away from us.

Best Regards,

Patricia Westman  
2212 Firwood Avenue  
Santa Rosa, CA 95403  
707-541-6411

**From:** [David McClary](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** No fees at Sonoma County Coast  
**Date:** Tuesday, March 01, 2016 9:12:52 PM

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I am a docent with the whale watch program at Bodega Head and would not be able to continue to volunteer because the fees would be out of my budget, not to mention the large number of people who visit who would not be able to because they are in the same position as I am. I strongly oppose the plan to charge to visit "OUR" coast.

Dave McClary

**From:** [Bob Beauchamp](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma Beaches/Nancy Cave  
**Date:** Wednesday, March 02, 2016 4:02:40 AM

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Greeting: The notion that we (the poor and middle class), should be required to pay a fee, especially those so exorbitant as currently proposed, on those few occasions when we want to find some unspoiled, not-privately-owned, natural setting (even for 20 minutes) is an American, capitalist, greed-based travesty. When does such indifferent cruelty get noticed by our leadership, and corrective measures taken?

Sincerely, Robert Beauchamp

**From:** [Sue Bates-Pintar](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma County Beach park fees  
**Date:** Wednesday, March 02, 2016 9:34:44 AM

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Please do NOT impose further parking fees on our Sonoma County parks- but especially those that really provide no amenities for the public. Its tax money that will not necessarily even benefit the parks you are taxing. It's unfair.

The coast is for everyone- not just people with money for parking. There are many, many families of very limited means who count on exposing their children to the beauty and joys of the coast- and thereby engendering a love and appreciation of it.

We must have each generation exposed so they will protect and value the coast in the future.

Thank you!

Sue Bates-Pintar  
Petaluma

**From:** [Darris](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** Sonoma Coast proposed beach access fees  
**Date:** Wednesday, March 02, 2016 1:37:41 PM

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To Whom it May Concern:

As a Bodega Bay resident, a mother and a life long beach advocate, I do not support the "pay to play" business model that State Parks is proposing for our Sonoma coast beaches.

I walk our beaches several times a week to enjoy the beauty of nature and pick up bags of trash. As a teen from a troubled home I went to the beach often to escape the uncertainty of my home life. Being at the beach was calming and grounding . . . access to the beach literally saved my life.

As a single mom the beach provided a place to go where me and my young son could play and reconnect. A place where we could find peace and escape from an abusive home life. The beach, once again, literally saved my life.

Now as an adult I am privileged and grateful to live on the Sonoma Coast. I talk to young people, single mom's and families about their experience at the ocean and I often hear stories much like my own.

One group that I haven't seen represented in the letters I've read and meetings I've attended regarding State Park beach fees is teens and young adults. Teens have little to no place to freely and legally congregate to enjoy one another and nature. Young adults just starting off in life are barely making rent. I see these groups at the beach and know how they will be impacted. If as a teen, young adult and single mom, I had to pay for access to the beach, I would not have been able to afford the fees.

I understand State Parks is struggling with their budget but it doesn't appear that much creativity has been applied to find funding. I would buy a \$20 Sonoma Coast State Parks pass. There are people who would put in volunteer hours for free access to State parks. Creative thinking is what's needed.

I urge you to uphold the spirit and intent of the California Coastal Act for free beach access for all.

Thank you for your consideration.

Sincerely yours,

*Darris. B. Nelson*

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<http://mamalovesthebeach.blogspot.com>

*Mama Loves the Beach is also on Facebook!*

**From:** [Jeff Pintar](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Appeal of CA's Proposed Parking Fees For Sonoma County Beaches  
**Date:** Wednesday, March 02, 2016 9:01:59 PM

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We support the Sonoma County Board of Supervisors in their appeal of the State's proposal to implement parking fees for Sonoma County Beaches and the California Constitution and the state's 1976 Coastal Act encourage "maximum access" to beaches and make no exceptions for financial hardship on the state's part.

Jeff Pintar

**From:** [Godie Gale](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Manned and un-manned pay stations on the coast  
**Date:** Thursday, March 03, 2016 1:53:46 PM  
**Attachments:** [cccbeach fees pg 1.pdf](#)  
[ccc beach fees pg 2.pdf](#)  
[cccbeach fees pg 3.pdf](#)  
[BofS Beach Fees pg 1.pdf](#)  
[BofS Beach Fees pg2.pdf](#)

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Attached are my objections to the State Parks proposal to charge fees at the ocean. I am a property owner in Sonoma County where my Board of Supervisors has rejected the above mentioned proposal. State Parks has appealed you, the CA Coastal Commission.

Please consider my comments when you are reviewing the state's appeal. Thank you.

Godie Gale, 4981 Conch Ave. Bodega Bay, CA 94923

FEBRUARY 25, 2016

TO: The CA Coastal Commission

FROM: GODIE GALE, 4981 CONCH AVENUE, BODEGA BAY, CA 94923

Thank you, Commission staff, for providing an opportunity for us members of the public to voice our concerns regarding a California State Parks' Plan/Appeal to install both manned and unmanned pay stations at Bodega Head, Shell Beach, Goat Rock, Stump Beach, etc. etc. etc.

- **WHOEVER IN HIS RIGHT MIND EVER THOUGHT THAT THE HARD WORKING, TAX-STRAPPED PEOPLE OF A NATION SHOULD HAVE TO PAY TO VIEW THE OCEAN, HEAR THE OCEAN, SMELL THE OCEAN, FEEL THE OCEAN AND PAY TO EVEN FEEL THE SAND BETWEEN OUR TOES!**

Background:

California State Parks had a scandal in 2012 (some kind of financial chicanery) and since then--according to a Vicky Waters, a State Parks Department spokeswoman,--the agency is "continuing to work to regain the public's trust."

Holding a "secret" meeting in Sebastopol last Wednesday, February 17, in which the public's input was not allowed, is a funny way of doing it. A tiny mention of a meeting being held on Feb 17, from 6:30 to 8:30 at the Sebastopol Community Cultural Center was mentioned one time: It was buried in a February 12, full page, Press Democrat article about the proposed beach fees. One had to read every word of the article to have spotted that small reference to the meeting. We were "allowed" to visit a couple of display tables where we were given permission to ask a question. My question had to do with State Parks proposal of charging \$65.00/year for a State Parks Pass. I made the suggestion that the State offer an equivalent to the Federal "Golden Age" pass which seniors 62 and older can purchase for \$10.00 and which are good for a lifetime. The revenue collected from the "baby boomer" population as well as us older seniors would more than help with the State Parks' financial issues. Although the State Parks employee's response was cordial, he acted like the fee collection on the beaches is a

done deal. Laughingly, he said I could visit Bodega Head eight times and the \$65.00/year proposed State Parks Pass would be paid for! (\$8.00/day would be charge at the manned and unmanned pay stations.)

- State Parks has significantly modified its proposal since they appealed their plan to the CA Coastal Commission. Some of the modifications are radically different from the original plan submitted to and rejected by Sonoma County and appealed to the CA Coastal Commission. The changes have the potential for even greater negative impacts on the coast than does the original proposal. I believe State Parks must start all over with a new proposal rather than appealing the original proposal and slipping the amendments through on the appeal. (The state legislature has prevented such “mischief” with regard to initiatives. In fact, Governor Brown is currently being sued by Sacramento County because Brown amended an original proposal *after* the public comment period.)
- According to CEQA, California State Parks MUST hold numerous, well advertised, scoping meetings in which the public is not only invited, but encouraged, to participate, to share our knowledge, to voice our concerns, and to expect answers to our questions. California State Parks must conduct a full EIR, submit it to the county for approval or rejection BEFORE commencing work on the project--NOT DURING AND NOT AFTER (see the 1988 Ninth Circuit Court of Appeals Decision in the LaFlamme vs. FERC decision.)
- Other laws with which State Parks must comply are the Americans with Disabilities Act as well as those (laws) that protect Native Americans (particularly the Coastal Pomo Indian Tribe.)
- A full feasibility study must be done and presented in such a way that the average citizen can understand it. It’s our money, so we have a right to know if our investment is profitable or, more importantly, if what we are sacrificing is worth it.
- There is a proposal in the legislature now (AB2002) which would provide for complete transparency with regard to the lobbying of the CA Coastal

Page 3 - Gale to California Coastal Commission 02/26/2016

Commission. I agree that the law should apply to both sides: pro-preservation of the public's access to the ocean and pro-development. Environmental activists, however, are no match for super packs like the one made up of 155 developers who most recently affected the California Coastal Commissioners 7-5 decision. Money talks.

- But so does the law. In this case the applicable law is the California Coastal Act, and the Commission has the responsibility to uphold it.

Thank you.

Sincerely,



Godie Gale

Cc: CA State Parks  
County Board of Supervisors

Godie Gale, 4981 Conch Ave., Bodega Bay, CA 94923

Thank you to my Board of Supervisors

2/17/2016

To: The California Coastal Commission members who are here to take notes, I want to thank the five of you who listened to the 29,000 citizens who wrote you in support of retaining the executive director--a fine researcher, an impartial, hard-working professional who has done an, honest, exemplary job. Thank you for your hard work and efforts to keep the Coastal Commission independent of political contamination. Thank you for fending off the billionaires and 157 super pack of developers--in spite of the fact that our own governor appears to be caving in to them. Please continue to protect our coastline so we don't look like Long Beach with it's oil pumps working 24/7 or parts of the coastal highway already lined with multiple story homes, hotels and condos.

In a letter we receive yesterday, the little boy whom my husband sponsors in the Phillipines, wrote in English, (His first language is Tagalog.) "Me and my siblings are cleaning our surroundings every morning." Sometimes we go on the seashore and enjoy the strong and fresh wind. Are you also doing this? If not, you should try it because it is rally enjoy-ful and very stressless. You will feel relaxment as you feel the air."

He couldn't have expressed more eloquently why thousands of hard-working citizens--endured the miles of bumper to bumper traffic to get to the ocean at Bodega Bay last weekend--for a few hours of "relaxment and stressless-ness."

I am not a historian, but I have read enough to know that many historians attribute the fall of the Roman Empire to its failure to provide leisure opportunities to its citizens. Opportunities for recreation, and play.

The hard-working, tax paying poor are not people who can afford cruises, safaris, swimming pools or country clubs. I think it's disrespectful--a slap in the face to charge us to "go to the seashore and enjoy the strong and fresh wind."

In 2010, after years of working multiple jobs, I left my home in Sacramento--where I was born and where I paid \$1200/year in property taxes. I made a

Godie Gale, 4981 Conch Ave., Bodega Bay, CA 94923

down payment on a 902 square foot dump overlooking the ocean. I now pay \$7000 in property taxes. ( We are further assessed a fire protection fee for Cal-Fire whose nearest facility is two and a half hours away. We pay assessments to our fire district who needs help staffing and funding their emergency management operations--rescuing 100's of people every year. Every sunny weekend, the helicopter flies over our house.)

As my husband and I are less able to climb around at the beaches, (we are approaching 80,) we are taking our car to the Kortum trail (parking is Shell Beach) and to Bodega Head to watch for whales. We do this at least once a week.

In the event that the CA Coastal Commission tries to supersede Sonoma County and its Local Coastal Plan, I would like to see a provision for us already-strapped, tax-paying, elderly, property owners to have a permit/placard in our car permitting us to park long enough for us to “enjoy the strong and fresh wind.”

Thank you.

**From:** [Bev Alexander](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Please NO PARKING FEES!  
**Date:** Thursday, March 03, 2016 5:16:30 PM

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Please do NOT impose further parking fees on our Sonoma County parks- but especially those that really provide no amenities for the public. Its tax money that will not necessarily even benefit the parks you are taxing. It's unfair.

The coast is for everyone- not just people with money for parking. There are many, many families of very limited means who count on exposing their children to the beauty and joys of the coast- and thereby engendering a love and appreciation of it.

We must make sure that every generation has access so they will love and protect our coastline into the future.

Thank you!

Beverly Alexander  
Petaluma

--

Everything you see has its roots in the unseen world. The forces change yet the essence remains the same. - Rumi

**From:** [Amy Fonarow](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Please do not impose more parking fees on Sonoma County Beaches  
**Date:** Saturday, March 05, 2016 3:22:02 AM

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Aloha!

I am originally from the Marin and Sonoma County areas, and I now live on Maui. I know how important beach access is for stress relief and reconnecting with this gorgeous planet of ours.

Oftentimes, the worries I seek to relieve stem from a lack of money. I go to the sea to remind myself of what is important and beautiful in life. I soak up the negative ions created by the waves crashing, breathe in the salt air, and receive reminders of the natural forces beyond my control. I leave the shore a better citizen than when I arrived.

If this experience were taken away from me . . . if I couldn't quite make it to the water's edge because I couldn't afford the parking fees . . . if nature were no longer free, I would feel extremely frustrated and angry. These emotions would lower my general mood as well as my ability to be productive. Being at the beach buoys my spirits!

I understand that you are seeking more cash, but please keep in mind that happier people are more productive. Happy people work harder, make more money, and pay more taxes, often because they have something like saltwater and sand beneath their feet to look forward to at the end of the day.

I respectfully request that you do not impose new parking fees on any Sonoma County beaches. We'd all be better off with free access to these beautiful coastal lands.

Mahalo nui loa (thank you very much) for your time and consideration regarding this important matter. My best to you and yours!

Sincerely,  
Amy Fonarow

~~~~~  
Amy Fonarow  
Writer - Editor- Technical Journalist  
[808.838.9527](tel:808.838.9527)

Though pleas'd to see the dolphins play  
I mind my compass and my way

~Matthew Greene

**From:** [Jim Martin](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Tax and spend CA government  
**Date:** Saturday, March 05, 2016 11:31:57 AM

---

I'm a 62 year old 3rd gen Californian. After travelling through other states across this country. I'm about to move...

You're taxing us beyond reason... now this plan to **pay to park** at more beach access points.

I see State operated camp spots that charge over 35 dollars/ night to sleep on dirt... with restrooms that are disgusting !

I've seen hotel rooms along the interstate for less money than that.

What exactly does our property taxes provide ? Besides funding for your exorbitant salary and benefits.

Jim Martin  
[www.santacruz kayaks.com](http://www.santacruz kayaks.com)  
831 661 0947

**From:** [Karen Guma](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** fees for beach access  
**Date:** Monday, March 07, 2016 6:04:16 PM

---

Please do NOT impose further parking fees on our Sonoma County parks- but especially those that really provide no amenities for the public. Its tax money that will not necessarily even benefit the parks you are taxing. It's unfair.

The coast is for everyone- not just people with money for parking. There are many, many families of very limited means who count on exposing their children to the beauty and joys of the coast- and thereby engendering a love and appreciation of it.

We must have each generation exposed so they will protect and value the coast in the future.

Thank you!

Karen Guma  
Petaluma, CA

**From:** [paul brewer](#)  
**To:** [SonomaStateParksAppeal@Coastal](#)  
**Subject:** No parking fees for our beaches.  
**Date:** Wednesday, March 09, 2016 9:14:14 PM

---

I am writing to express my strong opposition to the proposals for instigating parking fees at our Sonoma county beaches. The very idea is an outrage. The beaches belong to everyone, not just those that can afford to pay a fee. Government should be doing everything in it's power to ENCOURAGE people to use and enjoy the great natural wonder that is our coastline, rather than putting up obstacles, in the form of fees, that many (myself included) will be unable to afford. I am urging you to do everything in your power to prevent this obscene money-grab by the Coastal Commission. The beaches and coastline are not like some amusement park that can be owned and sold. They belong to every American citizen. Please put a stop to this insane plan to charge for visiting our God given coast.

Thank you.

Sincerely,

Paul Brewer.

**From:** [Markin Whitman](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** reduce or eliminate Sonoma Coast SP fee expansion  
**Date:** Thursday, March 10, 2016 7:01:52 AM

---

Coastal Commission Staff:

I am writing to join the Sonoma County Board of Supervisors in opposing the fee expansion at Sonoma Coast SParks

While I recognize and applaud that the earlier proposal has been downsized, this proposal is wrong for the people of California and for the vibrancy of the Sonoma Coast.

1. The timing is wrong - Crab fisheries has been closed for the first time ever and the salmon season is not looking good. We need to encourage, not discourage, locals and tourist alike in accessing the coast thus aiding the coastal economy.
2. The fee expansion, is, in effect, a regressive tax - This hits poorer people harder AND discourages them from the healthy and low-impact activities of walking coastal trails, getting fresh air and viewing wildlife. With an obesity crisis, especially among the lower incomes, discouraging people from using the coast will result in increased health issues and costs. I get a State Park Poppy pass each year so it won't affect me but I know many people in limited budgets cannot afford that.
3. It limits coastal access - this is the opposite of one of the main goals of the Coastal Commission. This strip of beaches was set up with the idea that they would remain free - State Parks is renegeing on that promise to the people of Sonoma County.
4. Options to private cars for these sites do not exist or are very limited. Unlike many popular beaches in California, there really is no alternative to using a car for access (and thus the need to park). The bus goes by here once a day and travels a limited route. Getting to Bodega Head from the bus route would require several miles of walking along a busy road.

Shell Beach and Bodega Head, in particular, provide access to enticing hiking trails and Shell Beach has unique climbing activities at Sunset Rocks in addition to as well known tidepooling: I remember studying at these two sites when at Bodega Marine Lab. Those studies helped shape my career in natural resources. The next generation should have as good an opportunity to learn, know and love the Sonoma Coast.

I realize State Park budget is having difficulties ( one reason I buy a pass each year). However, this is the wrong place and the wrong time to expand fees for revenue.

If some fee expansion must go forward, I implore:

- Let it be on Freezeout Creek and Willow Creek.
- Make the hours of operation for weekends only so low-income locals have access on weekdays to their backyard creeks and beaches
- If Bodega Head goes to fees, keep Hole-In- the-Head lot free

Thanks for listening to my comments in protest of the fee expansion.

Denying this expansion will serve California now and into the future.

Sincerely,  
Markin Whitman  
Sonoma County resident since 1989

=====

**From:** [Jennifer LaPorta](#)  
**To:** [SonomaStateParksAppeal@Coastal](#)  
**Subject:** No fees at beaches!!!!  
**Date:** Thursday, March 10, 2016 8:25:12 AM

---

I am dismayed to read about the proposal to start charging fees at the beaches on the Sonoma Coast.

Please do not start charging fees for beach access along the Sonoma Coast!!!!!! I am retired and cannot afford it .

When and where is the public Hearing in Santa Rosa in April?

**From:** [tomla](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Fw: No fees at beaches. they limit low income access  
**Date:** Thursday, March 10, 2016 9:03:15 AM

---

Dear Commissioners,

I read about the proposal to start charging parking fees at the beaches on the Sonoma Coast.

Please do not start charging fees for beach access along the Sonoma Coast! This will really restrict access for my poorer neighbors who are just getting by as it is. It'd be a shame for their memories of the beach to be in postcards. If you do go through with this plan, at least have discounted motorcycle parking spaces as well.

thanks,  
Tom Iaporta

**From:** [Pierre Delacroix](#)  
**To:** [SonomaStateParksAppeal@Coastal](#)  
**Subject:** this isn't "progress"  
**Date:** Thursday, March 10, 2016 3:15:41 PM

---

I'm sorry to hear that you are considering charging fees at Bodega Head and other spots along the Sonoma coast. As a long time resident of Santa Rosa, I think that our coast should remain accessible to all, including many low income workers in the area for whom the \$8 parking fee might be a deterrent to a day of family fun.

If you must charge a fee, why not make it a more reasonable \$3 ? Few people stay on the coast for a full day...most leave after an hour or so.

If these fees were used locally to repair our county's roads this scheme of yours would make a lot more sense to me.

Thanks - PD

**From:** [Dan Gilliland](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** parking fees on the beach  
**Date:** Thursday, March 10, 2016 4:19:21 PM

---

To whom it concerns,

I am a resident of Cotati, Ca, Sonoma County.

I implore the committee to not implement the beach restriction on our coast, and also not put in self-pay parking meters.

Our world and state and county are becoming just one big place for the governments to steal and pillage from its residents and this situation fits in right smack dab in the middle,

There is no reason to do this, It does not make it better for the public, it does not enhance the experience, it does not add value, so please just say no!!!!

Daniel Gilliland  
east Cotati Ave.  
Cotati, Ca. 94931

**From:** [Jackie Braun](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Letter  
**Date:** Thursday, March 10, 2016 5:12:27 PM

---

Please do not institute parking fees for beaches. Surely there must be some place on this planet for people with limited incomes to enjoy natural beauty without cost.

Jackie Braun  
Sebastopol

**From:** [Harvey](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** Parking fees for the Sonoma Coast  
**Date:** Friday, March 11, 2016 10:47:14 AM

---

Please oppose the proposal before the California Coastal Commission to charge for access to significant portions of the Sonoma Coast. Our 2 year old son loves to go to the beach, and paying for parking would make it more difficult for us to do that.

Thank you for your kind consideration of this matter.

Harvey Sherman

Love and compassion are necessities, not luxuries. Without them humanity cannot survive." —Dalai Lama

**From:** [Michael Lockert](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** charging for coastal access  
**Date:** Friday, March 11, 2016 11:26:51 AM

---

Dear Commissioners,

As a native Californian I find it shocking and beyond belief that the Coastal Commission is even considering charging residents for access to Sonoma County beaches, or any coastal beaches for that matter.

The Commission is purposed with the task of protecting the coast and guaranteeing access for all citizens, not just those who can afford to pay fees. From 1989 til 2013, the top 1% of households in Sonoma County saw their income grow by over 40%, while the remaining 99% saw a 10.4 % drop. All over California the statistics are similar. so now the Commission wants to increase the cost of enjoying our coast, making it more of a burden for the bottom 99%. This is cruel and unfair.

Please show some backbone and defend the principles that form the core purpose that Californians intended by creating the Coastal Commission.

Thanks you,  
Michael Lockert  
Sonoma County

**From:** [Michelle Irwin](mailto:Michelle_Irwin)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma County State Parks Appeal for Iron Rangers  
**Date:** Friday, March 11, 2016 4:00:16 PM

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Nancy Cave et al

Coastal Commission

San Francisco, CA 94118

Dear Commissioner Cave and all members of the Coastal Commission:

As activist decendants of Bill Kortum, West County residents of Sonoma County will not allow our public beach and coastal access to be any less than available to all...for free, for those who wish to partake of Nature's beauty. The "Presentation" to our community, the meeting held recently, in Sebastopol was a sham. The State Park presentators were ill-prepared, looking like deer caught in the headlights. The presenters could not offer any information regarding budgetary benefit to fee collection at our local beaches and picnic areas. They could not get past an incomplete sentence regarding sharing of "process"... how about some facts? Such as impact on our fragile coast line, lack of concern for social equity and affordability of recreation on our **PUBLIC land**.

One of the attendees had succinctly boiled down the issue to a placard reading "El Mar es por TODO" The ocean is for EVERYBODY. That placard helped voice our concerns, as there was no avenue presented for public comment at the meeting. If that meeting was intended to be informational, the way it was handled was a travesty.

Why not go back to the state budget and look at how revenue could be generated without use of an access fee (pay to play) on the coast. How about an additional surcharge on gas purchases? a .05% surcharge on wine sales in Sonoma County? or a slight increase in hotel tax and have the millions of tourists who visit Sonoma County help pay for the upkeep of our beach parking lots, restrooms, salaries of attendants, etc. Without a budget sheet presented at last week's meeting in Sebastopol, how can you expect to convince any of the West County residents of any fiduciary benefits of the beach admission fees?

I hope that the appeal to your Commission by the State Parks is a dismal failure, just like the "dismally inept presentation" I witnessed last week. Activists from our neck of the woods will be further motivated to a call for action at your front door on Bush Street. Based on the "process" on the matter thus far, most citizens here feel that our only recourse is actionable legal filings to halt the poorly planned proposal to take our coastal access away from the citizens.

Please, use the skills and determination of the Coastal Commission to request the State Parks to go back to the drawing board and be creative. Many alternatives are available to the present land grab and less than equal pay to play ideas that have been proposed thus far. Members of our community would be happy to brainstorm with you and end this folly of inept and unfair approach to fund raising.

I must admit, after hearing and seeing reports of the recent CCC meeting in Santa Monica, I feel we need to look at the Mission Statement of the CCC to ascertain IF the CCC is actually protecting our coasts the way intended.

Most Sincerely,

*Michelle K. Irwin,*  
Jenner Resident

[michelle.irwin@gmail.com](mailto:michelle.irwin@gmail.com)

--

Michelle K. Irwin

**From:** [Shannon](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** PLEASE DON'T CHARGE FOR PARKING  
**Date:** Saturday, March 12, 2016 6:48:38 PM

---

Hi there,

My name is Shannon Hoekstra and I was born and raised in Sonoma County. Growing up I would go with my friends to the Russian River and beaches as this was the only place we could go enjoy ourselves and especially visit with nature and not have to worry about not having enough money.

As an adult now I am an avid kayaker and would be so disappointed to find out locals, kids and the rest of us who cannot afford many luxuries would be prevented or obstructed from being able to visit these beloved places because we simply cannot afford to park there.

So basically only people who have money are permitted to visit public land and have the best parking space?

Please think of those who are less fortunate and show everyone that money is not everything. Unless you are planning on accepting EBT at the pay stations then you will see a big drop tourists and the like.

Thank you for your time and consideration.

Sincerely,  
Shannon Hoekstra

Sent from my iPhone

**From:** [carolyn\\_atwood](mailto:carolyn_atwood)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma coastal access fee proposal  
**Date:** Sunday, March 13, 2016 10:08:45 AM

---

As a local climber and member of the American Alpine Club and the Access fund, I oppose the sonoma coastal access fee proposal. It will severely restrict or eliminate access to coastal rock climbing that has been enjoyed safely and sustainably by the local climbing community for many years.

Carolyn Atwood  
650 228 6813  
La Honda CA

Sent from the Samsung Galaxy Rugby Pro, an AT&T LTE smartphone

**From:** [Betsy McConnell](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma County beach fees  
**Date:** Sunday, March 13, 2016 3:16:41 PM

---

I am writing to protest against the State Parks plan to install kiosks and charge parking fees for use of State Park Beaches. As a resident of, and long time homeowner in Sonoma County, it is important to me to keep the beaches free. If the state needs more money to operate the beaches, then perhaps some other monies—like the TOT tax in Sonoma county (so the tourists who don't have to pay our huge property taxes and cost of living expenses in California can help pay to enjoy or precious coast) can kick in and be used, or state general funds, or even only make out of state cars pay....something.

Thank you for your consideration

Elizabeth D McConnell

Monte Rio, Ca 95462

**From:** [Ellen Thwaites Brockman](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Fees  
**Date:** Tuesday, March 15, 2016 8:31:05 AM

---

Please do not make our beaches accessible only if you can afford it.

Excuse my fat thumbs,  
Sent from my iPad  
On the run.

**From:** [sulkyteen\\_agegirl](#)  
**To:** [SonomaStateParksAppeal@Coastal](#)  
**Subject:** please no pay stations!  
**Date:** Wednesday, March 16, 2016 10:43:32 AM

---

Please do not install pay stations at beaches along the Sonoma County coast.

This will reduce access to our beaches.

Thank you.

**From:** [Irene Barnard](#)  
**To:** [SonomaStateParksAppeal@Coastal](#)  
**Subject:** Say no to parking fees!  
**Date:** Wednesday, March 16, 2016 2:25:00 PM

---

Hello:

I'd like to express my (and my husband's) strong opposition to the plan to put in place parking fees at state parks and beaches along the Sonoma Coast. As you know, the cost of living is already untenable for many longtime (and new) residents of our county; therefore, being able to enjoy nature should continue to be free of charge, as it is one of the few remaining treasures that provide all these at once: inspiration, relaxation, rejuvenation, physical exercise/fitness, and education about the natural world.

Thanks very much,  
Irene Barnard, Bill Peterson  
Santa Rosa, CA

**From:** [Vesta Copestakes](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Coastal Beach Access Fees - possible solution  
**Date:** Wednesday, March 16, 2016 4:35:35 PM

---

Nancy Cave  
California Coastal Commission  
45 Fremont Street Suite 2000  
San Francisco, CA 94105

Dear Nancy Cave and the Coastal Commission,  
I have an idea that I think could raise money to maintain our most popular beaches while benefitting local artists and artisans along the California Coast.  
Instead of IRON RANGERS, use that location for a Portable Merchant Trailer.

The trailer would be a small store on wheels so it does not have to remain at the beach entrance every day and night. It can be brought home at night and during days when selling goods would be difficult because of bad weather or poor beach attendance. Small trailers that can be pulled behind a pickup truck would suffice.

The trailer would sell items where a percentage of sales would go to maintain the staff of the trailer and the trailer itself, the artists who supply the goods to be sold - and the State Beach it is supporting. This would function in the same way a Visitors Center functions but be small and portable. It could be set up next to restrooms just as easily as at the entrance to a beach park.

ITEMS SOLD could be:

- post cards and greeting cards of images created by local photographers and artists of our beautiful coast, critters, etc.
- Jewelry that features coast, beach, sea life themes
- stuffed animals of coastal critters
- wind mobiles of coastal critters
- books on sea life, coastal restoration, etc. with educational content
- maps and guides to beach access, trails, etc.
- binoculars and other ways to see distant sea life
- puzzles and games of coastal images
- kites and wind toys
- souvenirs

The trailer would take up about the same amount of space as an iron ranger  
Because it would be staffed and removed at night it would not be subject to vandalism

It would allow beach access to EVERYONE yet people who have money and desire to purchase the goods would be paying the fees to keep the park maintained.

I doubt anyone would have objections to this way of raising money. It would provide one or more local jobs, support local artists and promote coastal environmental awareness. I think this could be a win/win for everyone.

In Sonoma County this could probably be run by the Stewards of the Coast and Redwoods who already run two Visitors Centers and a mobile educational truck.

Please consider this option for supporting our FREE Beaches.

Thank you,  
Vesta Copestakes

Forestville, Sonoma County beach lover

Vesta Copestakes, publisher

**The Sonoma County Gazette**

6490 Front Street #300

Forestville, CA 95436

<http://www.sonomacountygazette.com/>

**707-887-0253**

FAX: 707-820-8127

Cell: 707-889-0069

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**From:** [Rod Hanson](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Parking fees  
**Date:** Friday, March 18, 2016 5:27:13 PM

---

I strongly oppose charging fees for access and parking at state beaches.

Rod Hanson  
707 632-5931

**From:** [JAMES HENDY](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** acces fees at beaches  
**Date:** Sunday, March 20, 2016 11:36:21 AM

---

Hi:

I have been a volunteer at somoma state coast park for ten years. it seems that many of the visitors are from out of sonoma county. they are on an outing from the bay area or on vacation from other parts of the state, country or foreign countries. I believe they should pay a fee on some beaches. however, a day at the beach from santa rosa, petaluma. etc is not an expensive outing. It should not be assumed that making this short trip means that 8\$ would be meaningless. I think sonoma county residents should be able to go to their beaches for free. I know it is a state park but it is called sonoma county state beaches.

I haven't seen anything about one charge ea day for entry to all fee areas on the sonoma county beach. does this go without saying. I wonder.

Roz Hendy

**From:** [Richard Fairfield](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Savita Wilder](#); [Jim@pfpros.com](mailto:Jim@pfpros.com); [Erik Cason](#)  
**Subject:** sonoma coast parking  
**Date:** Monday, March 21, 2016 9:48:43 AM

---

Dear State Parks, Please do not start charging parking fees at the beaches because:

1. there is no revenue to cost analysis
2. no study to determine what demographics will have reduced access
3. no input from educational and sports organizations
4. totally inadequate environmental impact study

Thank you, Richard Fairfield Santa Rosa

**From:** [Beth Thorp](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Sonoma Coast Fee Collection Proposal  
**Date:** Wednesday, March 23, 2016 11:40:29 AM

---

To Whom It May Concern,

I am against this whole plan in it's entirety, but as a homeowner on Willow Creek Road, I am very concerned about the change this would make on this road. The county road leading up to the state park boundary is very narrow. As it is, cars need to pull over to let another car pass, as the road is not wide enough for two cars to pass in multiple areas. I am concerned that increased traffic to this new park site would create a difficult traffic situation for all involved.

I feel as though the park would need to widen the road leading into the park. In addition to that, since there are no existing facilities at Willow Creek, there would be a need to install bathrooms etc. And what would happen to the parking area that is now considered the 'put in' that lands before the pay station site? Would people just be parking there and walking into the park? Or worse yet, parking all along the road to avoid a parking fee inside the park?

Somehow the money that would be needed to put into the Willow Creek area, seems to offset the 'income generating factor.' Obviously, I am not your accountant or controller, so I cannot really weigh in on that. I do however feel this would negatively impact the Willow Creek area.

Please consider my thoughts as a concerned citizen.

Beth Thorp  
P. O. Box 185  
Jenner, CA 95450  
707-363-1583  
[beththorp@mac.com](mailto:beththorp@mac.com)

**From:** [Katie Goodwin](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Thomas Addison](#); [Brady Robinson](#); [Erik Murdock](#)  
**Subject:** Access Funds Comments on the Sonoma Coast State Parks Fee Proposal  
**Date:** Thursday, March 24, 2016 9:15:05 AM  
**Attachments:** [Access Fund Comments on Sonoma Coast State Park Fee Proposal.pdf](#)

---

Dear Ms.Cave,

Please consider the Access Fund's comments on the Sonoma Coast State Park's Fee Proposal (see attached). Thank you for your review of our comments. Please feel free to contact me directly with any questions or comments.

Best Regards,  
Katie

**Katie Goodwin**

Public Lands Associate | [Access Fund](#)  
Direct: (303) 552-2843 General: (303) 545-6772  
[Facebook](#) | [Twitter](#) | [Instagram](#)

March 24, 2016

California Coastal Commission  
Attention: Nancy Cave  
45 Fremont Street #2000  
San Francisco, CA 94105

Submitted via email: [SonomaStateParksAppeal@Coastal.CA.gov](mailto:SonomaStateParksAppeal@Coastal.CA.gov)

**RE: Sonoma Coast State Parks Fee Proposal**

The Access Fund appreciates this opportunity to comment on the Sonoma Coast State Parks Fee Proposal. We greatly appreciate the proposed changes to the Fee Proposal which we understand remove the proposed kiosk location at Goat Rock Beach. That kiosk location would have eliminated roadside parking areas essential for climber's access to Sunset Rock. Sunset Rock is a significant climbing resource for San Francisco Bay area climbers. The Sonoma Coast State Parks offer a wide range of recreational opportunities for multiple user groups. While positive changes have been made to the Fee Proposal that directly benefit climbers, we continue to believe that imposing fees is inappropriate, both for other user groups as well as climbers.

**The Access Fund**

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 13,000 members and 100 local affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

**COMMENTS**

The Fee Proposal has been continually evolving making public comments to the California Coastal Commission (CCC) difficult. The latest Fee Proposal was released on March 15, 2016<sup>1</sup>. The Fee Proposal includes changes to the original Fee Proposal based on public comments. We are pleased access and parking for Sunset Rocks will not be blocked by a fee kiosk. However the

<sup>1</sup> California Coastal Commission De Novo Application Background and Project Description, Day Use Fee Collection Device Proposal, March 2016

current Fee Proposal includes limited and fragmented public scoping, and does not align with Coastal Act Policies. Moreover the implementation of this Fee Proposal would set an inappropriate precedence for user fees for California State Parks.

**Rock Climbing at Goat Beach-Sunset Rocks**

We are delighted that the proposed development of the three lane manned kiosk on Goat Rock Beach Road (Figure 1) was removed from the Fee Proposal in response to public comments.<sup>2</sup>

The previous proposal would have eliminated all essential parking and limit current trail access to Sunset Rocks, which is a significant and historic climbing resource for the San Francisco Bay area rock climbers. Sunset Rocks offer a short approach to a variety of top-rope routes and boulder problems ranging from V0-V10 making this a great climbing destination for beginners and expert climbers alike.



Photo: Sunset Rocks, Credit: Jerry Dodrill.



**Figure 1. Overview of previously-proposed kiosk at Goat Rock Road, Sunset Rocks parking and access<sup>3</sup>**

<sup>2</sup> Day Use Parking Fee Collection Proposal, Sonoma Coast SP and Salt Point SP, California State Parks. March 2016. Section 2.8 Public Comments and State Parks Responses.

<sup>3</sup> Sonoma Coast State Parks Fee Proposal, Entrance Station Concept Goat Rock Road, February 17, 2016. Labels

## Recommendations

The Fee Proposal was developed with limited and fragmented public scoping and does not align with Coastal Act Policies. We recommend additional user groups including the climbing community continue to be involved in the Fee Proposal planning in an organized manner. The introduction of fees to the selected coastal areas is contrary to the California Coastal Commissions mandate to maximize access to the public and will disproportionately affect economically disadvantaged users throughout the Sonoma Coast State Parks. *'The location and amount of new development should maintain and enhance public access to the coast'*.<sup>4</sup> In addition *'Lower cost visitor and recreational facilities and housing opportunities for persons and families of low or moderate income, as defined by Section 50093 of the Health and Safety Code, shall be protected, encouraged, and, where feasible, provided..'*<sup>5</sup>

The State Park's appeal to the California Coastal Commission is viewed by the community as an attempt to take jurisdiction away from the Sonoma County government who unanimously denied this Fee Proposal's coastal development permit. Allowing this Fee Proposal to go into effect would set an inappropriate precedent for new user fees at State Parks throughout all of California. We recommend that this Fee Proposal not be approved in its current form, adequate time should be given to the public to respond to the latest Fee Proposal, and additional public scoping should be conducted to include input from recreational users and the general public.

## Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help the State Park improve trails or other management needs. The local climbing community has a long history of positive environmental stewardship, and collaboration with other organizations to protect this wonderful portion of the coast. At the Access Fund we strive to work with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

\* \* \*

denoting current trail and parking added.

<sup>4</sup> Sonoma County Local Coastal Plan, Section VII. Development, Coastal Act Policies 30252

<sup>5</sup> Sonoma County Local Coastal Plan, Section VII. Development, Coastal Act Policies 30213

Thank you for your consideration of these comments on the Sonoma Coast State Parks Fee Proposal. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the State Parks. The Access Fund looks forward to participating throughout the planning process. Please keep us informed as the planning process proceeds. Finally, we truly appreciate the efforts of the Coastal Commission staff to seek input from diverse groups and interests in response to the State Parks proposal. Feel free to contact me via telephone (303-552-2843) or email ([katie@accessfund.org](mailto:katie@accessfund.org)) to discuss this matter further.

Best Regards,

A handwritten signature in black ink, appearing to read "Katie Goodwin". The signature is fluid and cursive, with the first name "Katie" being more prominent than the last name "Goodwin".

Katie Goodwin  
Public Lands Associate  
The Access Fund

Cc: Brady Robinson, Access Fund, Executive Director  
Erik Murdock, Access Fund, Policy Director  
Tom Addison, Access Fund, California Regional Coordinator

**From:** [Vertex Climbing](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Fee Proposal Concerns  
**Date:** Friday, March 25, 2016 10:23:39 AM

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Dear Nancy and the CA State Parks,

My name is Kevin Radle, general manager of the local climbing gym Vertex here in Santa Rosa. I am writing to you today to express my concerns regarding the State Parks recent fee proposal plan.

Vertex opened in 1995, and since opening we've offered youth programs and summer camps, both of which programs we take the participants climbing outdoors to the Sunset Rocks at Goat Rock beach periodically. Sunset rocks has been a significant resource to the climbing community here, and there are few other locations for beginners and young climbers to practice outdoor rock climbing.

Vertex is currently partnered with the B-Rad Foundation (501c3 non-profit) which provides under privileged and at-risk youth opportunities to try rock climbing. The proposed fee kiosks at Goat Rock and all the other proposed locations would be detrimental to our climbing programs ability to continue hosting outdoor climbing days. On a more personal level, it would also be devastating for low income or at-risk members of our community to access this limited coastal resource. One should not be required to pay to visit public beaches.

The proposed fees are not consistent with the Coastal Commission's mandate to provide maximum access to the community. To me that is the sole reason why the CCC should exist, and it would be a failure of the CCC and the State Parks to restrict public access via mandatory daily parking fees. In addition, day use fees for unimproved roadside parking sites with no amenities is not appropriate.

Thank you in advance for listening and I hope the voice of our community is heard.

--

**Kevin Radle**  
General Manager  
Vertex Climbing Center  
(707) 573-1608  
3358A Coffey Ln.  
Santa Rosa, CA 95403

[Vertex's website](#)



**From:** [Matt Fabiano](#)  
**To:** [SonomaStateParksAppeal@Coastal](#)  
**Subject:** Opposed to beach fees  
**Date:** Friday, March 25, 2016 11:36:23 AM

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Dear Nancy,

I am writing you today to oppose the planned beach fees along the Sonoma County Coast. I believe the coast should be available to all and that State Parks has not evaluated the cost of pay stations and has inflated the amount of revenue they will receive.

Sincerely yours,

Matt Fabiano

Matthew Fabiano *Writer/Producer*

**CULTURE POP FILMS**

MEDIA FOR THE MASSES

[Web](#) [Facebook](#) [Twitter](#)

**From:** [Jodi Stone](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Keep our Sonoma Coast Beaches accessible to all  
**Date:** Friday, March 25, 2016 11:39:40 AM

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Dear Nancy,

I am writing you today to oppose the planned beach fees along the Sonoma County Coast. I believe the coast should be available to all and that State Parks has not evaluated the cost of pay stations and has inflated the amount of revenue they will receive.

Sincerely yours,

Jodi Stone

**From:** [Alden Olmsted](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Dear Nancy I oppose the beach fees  
**Date:** Friday, March 25, 2016 11:47:31 AM  
**Attachments:** [Coastal Commission.pdf](#)

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Attached photo:

Salmon Creek Gold ©2016 Alden Olmsted

**Alden Olmsted**

Local Art & Landscape Photography

[aldenolmsted.com](http://aldenolmsted.com)

T: 707.799.7663

 [Facebook](#) |  [Twitter](#)

Alden John Olmsted  
Filmmaker/ Photographer/ Activist

P.O. Box 1142  
Santa Rosa, CA 95402  
707.799.7663  
alden.olmsted@gmail.com

March 25, 2016

California Coastal Commission  
Attn: Nancy Cave  
45 Fremont Street #2000  
San Francisco, CA 94105

Dear Nancy,

I am writing you today to vigorously oppose the planned beach fees along the Sonoma County Coast. California State Parks has not released the cost of installation of the kiosks or the pay station technology, and has inflated the revenue to be collected.

My father, John Olmsted, who was the first botanist at Golden Gate Park, built two of our CA state parks - Jug Handle Natural Reserve in Mendocino, and the wheelchair accessible Independence Trail in Nevada City. While my dad was doing this my mom raised us on a single parent salary in Sonoma, but she never let us feel underprivileged - she worked hard to provide and to show us California - including our beautiful coast. My mom would not be able to afford \$8 per visit or \$195 per year, and free days do not always work for working parents. Access to our coast is legislated to us all, and there are many other sources to raise the \$1.5 million suggested by these fees.

Places like Central Park (designed by my cousin Frederick Law Olmsted), Griffith Park in Los Angeles - the largest urban park in the U.S., Golden Gate park, and many others, allow people of all ages and income levels to enjoy and receive the qualities that time in nature provides. Please do the right thing for Sonoma County residents and coastal visitors from around the world and keep our beaches free.

In 2011 I raised money to assure that 11 of the 70 intended state parks to close would in fact remain open. I did this \$1 at a time and sent a message to state parks that we deserve responsible management of our parks, which includes creative strategies to raise funds. There's nothing new or creative about a blatant money grab.

Sincerely yours,



**From:** [Gina Fabiano](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** No Beach Fees!!  
**Date:** Friday, March 25, 2016 1:54:46 PM

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March 25, 2016

California Coastal Commission  
Attn: Nancy Cave  
45 Fremont Street #2000  
San Francisco, CA 94105

Dear Ms Cave,

I am writing you today to oppose the planned beach fees along the Sonoma County Coast.

I believe the coast should be available to all and that State Parks has not evaluated the cost of pay stations and has inflated the amount of revenue they will receive.

This is what makes California so great - why restrict it to only those who can afford it.

It is discrimination!

Sincerely yours,

Gina Fabiano

**From:** [Clare Najarian](mailto:Clare.Najarian)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** attn: Nancy Cave NO CHARGES TO SEE OUR STATE BEACHES....E VER!!  
**Date:** Friday, March 25, 2016 2:43:42 PM

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DEAR NANCY CAVE,  
PLEASE FORWARD MY TOTAL OPPOSITION TO THE CHARGING OF FEES AT BODEGA HEAD,  
GOAT ROCK, SHELL BEACH, AND STUMP BEACH. NO NO NO NO NO NO NO NO (DO YOU GET  
MY DRIFT?) NO NO NO

NOT EVER.....

THE COASTAL COMMISSION DOES NOT HAVE THE CONSTITUTIONAL RIGHT TO CHARGE THE  
PUBLIC FOR ACCESS TO THESE JEWELS OF THE SONOMA COAST. THE PEOPLE HAVE THE  
RIGHT TO FREE ACCESS IN PERPETUITY!!

YOU REPRESENT A VERY SORRY GROUP OF PEOPLE WHO SIMPLY DO NOT GET IT. DID  
ANY OF YOU LISTEN TO THE PEOPLE AT TWO PREVIOUS MEETINGS IN SEBASTOPOL AND  
SANTA ROSA? WHAT DON'T YOU GET???

WE WILL NOT PAY....EVER....WE WILL NOT PAY....EVER

THE PEOPLE HAVE A RIGHT TO THESE JEWELS OF NATURE; THE STATE AND COASTAL  
COMMISSION DO NOT HAVE THE RIGHT TO CHARGE.....EVER.

I WILL NEVER PAY TO SEE A SUNSET AT BODEGA HEAR, I WILL NEVER PAY TO TAKE MY  
GRANDCHILDREN FOR A WALK AT SHELL BEACH OR GOAT ROCK, I WILL NEVER PAY TO FOR  
ACCESS TO STUMP BEACH....EVER!!!!

SHAME ON ALL OF YOU, THE COASTAL COMMISSION, THE GOVERNOR, AND ALL THAT  
WOULD LEVY THIS ATROCIOUS FEE ON THE PUBLIC.

DO YOUR JOB, NANCY AND REPRESENT THOSE WHO DO NOT WANT THIS FEE. IT IS AN  
EGREGIOUS MOVE ON THE PART OF THOSE WHO THINK THEY HAVE THE ANSWERS AND  
WHO THINK THEY HAVE THE POWER. THE PEOPLE HAVE THE POWER AND IF IT TAKES A  
LOT PUBLIC OPPOSITION TO MAKE THESE ATROCIOUS FEE COLLECTING STATIONS GO  
AWAY....LET'S HOPE FOR THE BEST.

**From:** [Charles Thorell](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** no beach fees  
**Date:** Friday, March 25, 2016 3:18:11 PM

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March 25, 2016

California Coastal Commission  
Attn: Nancy Cave  
45 Fremont Street #2000  
San Francisco, CA 94105

Dear Nancy,

I am writing to let you know of my opposition to the planned beach fees along the Sonoma County Coast. I believe this area should be available to all and that State Parks has not evaluated the cost of pay stations and has inflated the amount of revenue they will receive

Sincerely,

Charles Thorell

**From:** [Vince Sugrue](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Goat Rock Fee Proposal  
**Date:** Friday, March 25, 2016 10:04:37 PM

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To whom it may concern,

As someone looking to move to buy a house and start a family in the Sonoma County area, I would like to express the importance of keeping the coastal access areas free of charge and a public good that our taxes can pay for. I've made tons of memories along the Sonoma coast, and it is the coast that inspires me to want to move to the area. I want others to share in this feeling, and because certain areas, such as goat rock, are free to the public right now, they have an amazing opportunity to experience and build a better appreciation for nature. Please reject the Sonoma Coast fee proposal.

Thank you for your time and consideration.

- Vince Sugrue  
925-487-1194

**From:** [Sonic](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Fee at coastal parks  
**Date:** Saturday, March 26, 2016 11:22:45 AM

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I support keeping coastal access free and no iron Rangers alone California. Coast.

From Chet.

**From:** [ceaview63@comcast.net](mailto:ceaview63@comcast.net)  
**To:** [Cave.Nancy@Coastal](mailto:Cave.Nancy@Coastal); [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Ainsworth.John@Coastal](mailto:Ainsworth.John@Coastal); [Carl.Dan@Coastal](mailto:Carl.Dan@Coastal)  
**Subject:** Re: Sonoma Coast Surfrider Comments to CCC on SP Fee Proposal  
**Date:** Monday, March 28, 2016 11:22:41 AM  
**Attachments:** [SCSF CCC Comments for 4-13-16.docx](#)  
[Observations on ADA grading.docx](#)  
[State Parks Parking Lot Site Plans.pdf](#)

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Dear Nancy

Please find attached comments from Sonoma Coast Surfrider Foundation recommending denial of DPR's Day Use Parking Fee Collection Devise Proposal. Included in the attachments are comments and diagrams regarding observations on ADA compliance for the proposed areas. I hope this is of help in preparing staff recommendations and finalizing your report.

Sincerely,

Cea Higgins

Policy & Volunteer Coordinator

Sonoma Coast Chapter of Surfrider Foundation



*The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. The Surfrider Foundation now maintains over 90 chapters and 250,000 members, supporters, and activists in the U.S.*

March 22, 2016

Attention: Nancy Cave, District Manager  
North Central Coastal District  
California Coastal Commission  
Re: A-2-SON-13-0219  
California State Parks' Proposed Fee Collection on the Sonoma Coast

The Sonoma Coast Chapter of the Surfrider Foundation recommends denial of the State Park's proposal to implement fees at Bodega Head, Shell Beach, Goat Rock State Beach, & Stump Beach parking area at Salt Point State Beach Park. Surfrider has enjoyed a longstanding cooperative relationship with Department of Parks & Recreation; however our organization's mission to preserve coastal access and resources prevents us from supporting this proposal because the submitted proposal:

- Proposal provides inadequate information of the specifics of the project or any analysis of the impacts and fails to meet both CEQA and Coastal Act requirements,
- Is a violation of public access provisions of the Coastal Act,
- Contains numerous inconsistencies and unsubstantiated data to support DRP's claims, and
- Is the result of a flawed public process

**Inadequate CEQA analysis:** While we recognize that the Coastal Commission's staff report is used as the equivalent to CEQA, the fact that the required information and analysis necessary for complete

disclosure is not available to the commission's staff requires that this project be denied. The 2012 exemption for the original proposal submitted to Sonoma County PRMD which is now being re-utilized by DPR to satisfy CEQA guidelines in this current proposal did not account for the grading or paving necessary to reach ADA compliance, did not account for the change in intensity or density of use that would result from imposition of fees, did not identify natural resources to be managed or protected in the fee areas, and did not identify impacts to natural resources as a result of new fees.

Therefore, if the original CEQA exemption was determined to be inadequate to meet the actual scope of the original proposed project, there is no possibility that it could be adequate for the current proposal which now includes ADA compliance and claims of the necessity of fees to manage resources.

The original Notice of Exemption described the nature and purpose of the project as:

*“...installing 14 self-pay stations and fee signage within Salt Point and Sonoma Coast State Parks. Installation consists of; excavation of holes (maximum 3’ depth X 2’ width), iron rangers set in concrete and sign posts in crushed rock and backfilled with native soil.”*

This description does not include the scope of development involved in grading/paving for ADA compliant parking and pathways or the impacts associated with this level of development which should be analyzed as part of CEQA review. The project description in this revised proposal now includes a provision that includes ADA accessible parking and routes between the accessible parking spaces and fee collection stations. §3.1 of the current proposal under Project Description now acknowledges the physical design features required for *“Construction of the appropriate number of accessible parking spaces commensurate with parking lot capacity”* & *“Construction of ADA compliant concrete paths to connect accessible parking with fee stations.”* **§5.3. ADA Accessibility provides:** *“Each project undertaken by State Parks must be designed and implemented to comply with the Americans with Disabilities Act.”*

However, there is no analysis of the level of grading or paving required and the impacts to coastal resources from the grading. Without such information the impacts to coastal resources cannot be determined. In addition, the current State Park Site plans do not fully meet ADA compliance requirements. DPR currently fails to provide individuals with disabilities adequate access to the Sonoma Coast.



(See attached State Parks Site Plan analysis with noted deficiencies and comments regarding ADA compliance requirements).

Therefore, a complete analysis of the impacts of grading and paving to achieve ADA compliance must be conducted as part of the project's analysis prior to approval of a permit.

Natural Resources:

The original justifications for an exemption were listed as:

*“project consists of construction and location of limited numbers of new, small facilities, minor public alterations.....and construction or placement of minor structures accessory to (and appurtenant to) existing facilities included as “installation of signs” and “installation of fee collection devices”*

The current proposal in § 1.0 states that *“The proposed project would provide State Parks the ability to more effectively manage vehicular parking during peak use periods on up to 8 existing day use parking areas in Sonoma Coast State Park and Salt Point State Park, as necessary to better accommodate use and prevent deterioration of natural resources”* however there is no analysis of what natural resources are in a given area, where these unidentified resources are located in relation to parking areas, what impacts public use has on those unspecified resources, or how limiting access will protect the unspecified resources.

Therefore, an analysis that comprehensively identifies natural resources to be protected must be conducted as part of any submittal to the Coastal Commission and completed prior to approval of the States Parks proposal. Without such information a determination of the justification under the Coastal Act for imposition of fees based on the necessity to protect natural resources is not possible.

## **Public Access & Coastal Act Compliance:**

The Sonoma Coast is a “car dependent for access” coastline. There exists no viable public transportation, no urban areas adjacent to coastal access, and no safe means of access by biking or walking. In order to visit the Sonoma Coast beaches, one has to drive and park. Charging for parking is charging to access the coast.

The Coastal Act provides:

•**Section 30210:** Access: In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted and recreational opportunities, shall be provided for all the people...

•**Section 30213:** Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided.

Revenue generation is not legally recognized as a factor in the Coastal Act to limit public access and the imposition of parking fees for the purposes of revenue generation is insufficient justification on its own to limit maximum access opportunities to the coast. DPR claims under §2.5 that newly implemented fees would enhance public access by providing better services and amenities.

As reported in the Commission’s “**Appeal Staff Report; Substantial Issue Determination**” dated April 3, 2015: “...it is not so clearly demonstrated that fees collected under State Parks’ proposed Sonoma Coast project would result in proportionate increases in services that would enhance public access at the very same State Park units on the Sonoma Coast” unless “Parks can demonstrate that there is direct connection between the fees proposed through the denied project and resultant actions/improvements at Sonoma County coastal State Parks units” (page 15)

DPR has failed to show this connection in the current proposal or how they will meet target revenue goals that would result in funds generated from fees actually being utilized in the areas where fees will be implemented. **Public Resource Code 5010.7** requires that funds must be used towards further “fee generating” projects rather than applied to deferred maintenance or enhancing services throughout the Park including those not generating income. In fact, under §2.5 DPR states that “fees collected at state park units are deposition in the State Parks and Recreation fund which is **available upon appropriation by the legislature**”. There is no guarantee that this will occur nor any guarantee, if appropriated, will be spent at the locations generating the income.

Additionally, the current proposal advocates that fees will be used to limit public access as a means to protect coastal resources. In § 4.3 **Consistency with the California Coastal Act**, DPR states that the revised plan will “*maintain maximum public access*”. How can limiting the number of parking spaces and eliminating free ones maintain public access when this stretch of coast can only be reached by the use of private cars? This statement is also inconsistent with the stated goal of the project to reduce impacts on ESHA by reducing over-all public access and use.

**§5.1 ESHA:** Fees will be utilized “as a tool to achieve that balance. If overuse results in resource degradation, the plan calls for implementation of measures including: facility design; installation of barriers; surface treatments; area or facility closure; change in access locations, or redirection of visitors to other areas. Other methods include regulations including limiting the number of people, location or time of use.” DPR fails to explain any of the specifics of the implementation measures or how they would reduce resource degradation rather than expand it by creating new, uncontrolled parking areas. The only method appears to be reduction in usages, which is totally inconsistent with both the Coastal Act and DPR's own statement in § 5.5 where they specifically state that after an initial decrease in attendance the attendance will "rebound". If the primary means to reduce resource degradation is by reducing public use and such use "rebounds" then there will be no benefit to the resources. In fact, by creating new areas which the public will use when their current free parking areas are closed to them, the net impact to coastal resources will be a negative one. DPR's suggestion that those parking along several of the unpaved areas will be subject to payment of fess is without any clue as to how that would be achieved

Therefore, it is difficult to reconcile DPR’s conflicting claims that fees enhance public access while at the same time limiting public access.

#### Disproportionate Impact to Youth, Elderly, and Low Income

The current proposal states under § 1.5 **Economic Impact** that “*Household incomes for visitors are relatively high with 57% earning over \$75,000 annually and only 15% earning less than \$40,000.*” However there is no citation that verifies the source of these statistics nor any indication if it includes the household incomes for the visitors from the San Joaquin and Sacramento Valleys which it states under §1.5 make up the majority of users. Sonoma Coast Surfrider also challenges this assertion by DPR as it is inconsistent with our observations as well as data available on demographics of visitors to the coast. According to Measure of America “A Portrait of Sonoma County” (<http://www.measureofamerica.org/sonoma/>), the 2014 median earnings, the main gauge of material living standards in this report, are \$30,214 annually in Sonoma County which is on par with earnings in California which is significantly lower than what DPR reports.

A significant portion of users to the coast are minorities, low income, youth, and the elderly and not the affluent as portrayed in DPR statistics and consist of both a local population as well as inland visitors.

State Parks responds to concerns about disproportionate impacts to these communities with the offer of special passes to offset these impacts. The current special & discounted passes available are inadequate in offsetting the impacts to the groups they purportedly serve.

For example:

1. “GOLDEN POPPY VEHICLE DAY USE ANNUAL PASS – the lowest price pass available costs \$125.00 yet is not valid at the high demand Southern California Beach Parks and admittance and use with the pass is still subject to available space.
2. DISABLED DISCOUNT PASS –costs \$3.50; however, this pass only entitles the bearer to a 50% discount for vehicle day use. Those with physical disabilities will require a path of travel from an ADA compliant parking space to the APM fee collection machine and still need to afford ½ the fee.
3. DISTINGUISHED VETERAN PASS - No Fee (Lifetime Pass) only applies to “honorably discharged” veterans and excludes veterans who are “generally discharged under honorable conditions”.
4. LIMITED USE GOLDEN BEAR PASS –costs \$20.00 for seniors (persons 62 years of age or older) but only works during Non-Peak Season so **can’t be used during summer or holidays.**
5. GOLDEN BEAR PASS – costs \$5.00 for any qualifying person. To qualify a single person must be making less than \$11,328 or \$21,012 for married persons and must submit a tax return and get a sign off from their caseworker if receiving SSI. These rates are less than minimum wage and anyone earning more that this is not eligible for the discounted pass.

According to realistic incomes levels of Sonoma Coast State beach users and visitors there is a significant portion of the population that falls between qualifying for these special passes and those having enough disposable income to pay fees to access the coast. The GOLDEN BEAR PASS does not provide any help for those who need it the most and the application process is difficult and degrading. The annual income level cap means that only those who cannot afford a car might be able to get it. Those who are working at minimum wage and need it the most do not qualify. Even when qualifying, public access is limited by the conditions of the passes themselves and the proposal’s aims to limit access even for pass holders. Also DPR’s website to apply for special passes, even though available in other languages, does not have applications available for the special passes in any other language but English.

### Negative Precedent:

The Commission determined that the justification for finding substantial issue to remove jurisdiction from Sonoma County in April 2015 was because the fee proposal had STATEWIDE implication and that “*these types of statewide issues warrant the Commissions involvement*”. Utilizing this basis for their decision means that the current proposal and result in Sonoma County has the potential to set statewide precedent which will be followed along the entire coast of California. Approval of fees in Sonoma County paves the way to implement fees at unpaved parking areas with minimal amenities through-out the California coastline currently free and providing alternative access to the coast for those that cannot afford to pay for higher developed coastal access lots. The negative and disproportionate impact to public access which the Coastal Act exists to prevent is at issue with this proposal. DPR has already applied for the right to implement fees at undeveloped parking areas in Mendocino County.

### Failure to Comply with the Provisions of the Certified LCP

DPR states in §4.2 that the project is consistent with the Sonoma County LCP however, the County in its analysis made it clear that there are numerous provisions of the LCP that the project does not comply with. In particular, DPR states that the LCP merely states "No change" to the current access available and that this does not include the imposition of fees. However, under the Coastal Act any change in the density or intensity of use is considered development. Therefore the project is considered to be development under the Coastal Act and "no change" means no change in development. Any new development is thus inconsistent with the LCP and requires an amendment to the LCP.

### Inconsistencies and Unsubstantiated Data in Proposal of Concern:

- **§1.4 Visitor Data** states that monitoring of vehicle counts utilizing TRAFx data counters to establish baseline visitation data began in May 2015. Prior to this time DPR has repeatedly stated in public hearings that baseline data did not exist. The proposal; however, includes a chart in **§1.3 Visitation to Sonoma Coast State Park** showing “free day use” statistics for fiscal years beginning 2000/2001 through 2013-2014 without explaining how that data was determined or arrived at. In addition, DPR states that the “method of tracking” does not identify how many vehicles enter versus exit in an hour and only provides the raw data of vehicles triggering a counter.” What they do not acknowledge is how many vehicles are entering and exiting without remaining or actually using the area. The visitation numbers reported are ambiguous and unverified however they are being relied upon to determine revenue goals and justifying reasoning to limit access.

- **§1.4 Visitor Data** states that on certain heavily impacted days at Bodega Head there are more vehicles visiting the Park than parking spaces available. What DPR fails to mention is that they have closed Bodega Head East Lot with 100 parking spaces for over 4 years and therefore channeled all cars to the Bodega West lot. All data gathered for Bodega Head and the impacts of peak use reported are inaccurate as there are no traffic counts for utilization of Bodega Head East Parking lot.
- In **Appendix A "Parking Overview in Sonoma Coast State Park and Salt Point State Park"** DPR indicates 2,414 existing parking stalls. This statistic is being used in **§ 2.1 Existing Conditions** to help support the statement that DPR is challenged to staff and maintain these areas with current revenue generation. We want to point out that 482 "parking stalls" (20%) of the total number are roadside shoulders barely a car width and simply dirt without vegetation. Many of these shoulders are in obscure locations such as "Cemetery" and "Orchard" at Fort Ross State Historic Park and several miles from beach access at the proposed new fee locations. It is a distortion of actual circumstances to imply that they offer viable free parking opportunities for the general populace using Sonoma Coast State Beaches or adding to DPR's hardship of park staffing and maintenance. It should also be noted that DPR recommends installing signage at roadside parking adjunct to fee'd parking lots to inform people there is a fee to park there as well.
- In **Appendix A Parking Overview in Sonoma Coast State Park and Salt Point State Park** DPR depicts a graph which shows that Salt Point lot currently has fees in 82% of developed parking areas, will fee under the proposal an additional 11% when adding the "Stump Beach lot" and leave only 7% of possible access to the coast as free. The inclusion of Stump Beach as a fee location leaving only 7% free access opportunities not only exemplifies DPR's failure to account for public access impacts but also shows that DPR changes the definition of "developed" and "undeveloped" throughout the proposal. DPR classifies Stump Beach lot as "*developed*" although **Appendix F Associated Projects** reveals that the restroom is non-functioning, there is no potable water, and grading/paving would be required for ADA compliance. DPR fails to define the parameters of what constitutes "developed" v. "undeveloped lots" and "amenities provided" is inconsistent and malleable to suit DPR's justifications for implementing fees.
- DPR claims that installation of the fee collection device in certain locations will not induce people to park outside of the day use parking area in areas that have never seen parking, to avoid paying fees because the shoulders on SR 1 in the vicinity have "*dense vegetation, roadside ditches, or other topography that severely limits the ability for creation of shoulder parking.*" Historic practices show otherwise and visitors avoiding fees will continue to seek out dangerous

parking or parking in sensitive habitat to avoid fees resulting in additional resource damage which is not accounted for in any analysis of the net impact of the project.



- **§2.7 “Traffic and Parking Impacts”** DPR recognizes that there “*a few locations where patron may elect to park informally and walk-in rather than pay a day-use fee, creating new parking areas and associated social trails through sensitive habitats*” and cites one of these locations as Shell Beach. Later in the proposal in **§5.1 ESHA** DPR states that at Shell Beach the “*fee collection devices will not induce people to park outside of the day use areas that have never seen parking, to avoid fees*” If DPR is already aware of areas where volunteer trails through sensitive areas exists then rather than utilizing this as a justification that there are “no new” impacts, DPR should be seeking ways to protect these areas rather than increase their usage by adjacent installation of fee collection.
- In **§4.3. CONSISTENCY WITH THE CALIFORNIA COASTAL ACT**, DPR interprets **§30214** to mean that there must be some “limits to free and unrestrained access” and that fees are being implemented in an area where there is “Wholesale free-for-all beach access”. However, **§30210** place only four limitations on the requirement for maximum access and the collection of fees is not one of them. Currently on the Sonoma Coast there is not wholesale free access as DPR charges at Bodega Dunes, Wrights Beach, Reef, Fort Ross, Gerstle Cove, Woodside, and Fisk Mill locations which are staffed parks with camping, programming, and other amenities.
- **Appendix D Response to Comment 5** provides that public access will not be limited because “... fees will only be charged during peak use times.” In other portions of the application DPR does not limit the collection of fees to peak times only. DPR does not explain this anywhere in their application.

Failure to meet Commission’s conditions in other areas where fees have been implemented:

In other areas of California where the Commission has approved fee permits, approval was conditioned upon DPR “*monitoring and periodically reviewing the implementation of any new fee program including impacts on coastal access and annually reporting to the commission available and relevant monitoring data and evaluation including but not limited to daily attendance and impacts to public access.*” To date, DPR has failed to comply with these reporting requirements and no evaluation has been conducted to show if the higher fees had an impact on coastal access or what groups were most affected. **These studies need to be conducted by Parks and evaluated by the Commission before further fees are approved.**

In the current proposal DPR claims in §4.5. **Consistency with the 2013 Agreement between State Parks and CCC** that “*State Parks has incorporated all the measures recommended therein in this proposed project*” and that “*to the extent that the approaches are applicable, they have been incorporated into the Revised Fee Proposal.*” DPR does not list specifically which measures or approaches have been integrated into the revised proposal. In addition if DPR has not met the conditions imposed in other areas, there is little reason to believe that conditions will be complied with under this current permit if approved and impacts to public access and environmental resources will most likely not be measured or reported.

**Public & Stakeholder Process:**

While appreciating State Parks efforts to gather public and stakeholder input, the process was flawed because:

- Many affected groups whose access rights will be disproportionately impacted by new fees, such as Latinos, Native Americans, and low & limited income communities were not included in the stakeholder process even though representatives were available and expressed their interest in being included.
- Throughout the stakeholder process, there was never attendance by state level DPR staff even though their presence was continually requested by the groups involved. This resulted in uncertainty as to which proposal was being evaluated. This caused an unreasonable delay in the planning and notice of the actual goal of the stake holder process which was to design and implement a public forum to gather community input on the proposal.
- In §2.7 **Public Outreach Efforts** DPR claims that at the open house on February 17<sup>th</sup> the “*...meeting quickly became contentious and State Parks was never able to fully articulate its vision*” however what they fail to mention is that State Parks’ staff were refusing to allow public

comment as promised to stakeholders prior to the forum and expected by the attendees-this is what caused the contention.

- The proposed project is continually changing without the ability of the public to have proper notice or the time required to comment fully on it.

For the above reasons, Sonoma Coast Surfrider is recommending denial of DPR's de Novo Application.

Thank you,

*Cea Higgins*

Sonoma Coast Surfrider  
Policy and Volunteer Coordinator

*Spencer Nilson*

Sonoma Coast Surfrider  
Chair

## **Observations on ADA grading/paving requirements for State Parks fee proposal:**

After review of State Parks proposed parking improvements and the associated construction I have the following observations regarding ADA parking and pathway requirements:

1. Unpaved gravel lots at Bodega Head East and Bodega Head West pose a conundrum for determining the correct number of accessible parking spaces based on the total number of parking spaces provided. The best solution is to use State Parks own parking capacity data for each location. When this is done it indicates that more accessible parking needs to be provided at each location.
  - o Bodega Head East: 101 total parking spaces requires 5 accessible spaces including 1 van accessible stall - only 2 accessible spaces are shown on Site Plan Sheet L-1. Estimated grading/paving area for parking spaces, walkways and APPM pad = 1,900 square feet.
  - o Bodega Head West: 92 total parking spaces requires 4 accessible spaces including 1 van accessible stall - only 3 accessible spaces are shown on Site plan Sheet L-2. Estimated grading/paving area for parking spaces, walkways and APPM pad = 1,150 square feet.
2. Shell Beach: 38 total parking spaces requires 2 accessible spaces including 1 van accessible stall. Site Plan Sheet L-3 shows the required 2 accessible spaces. Existing paved parking lot gets restriped. Estimated grading/paving area for walkways and APPM pad = 640 square feet.
3. Blind Beach: 18 total parking spaces requires 1 accessible parking space which would be a van accessible stall. Site Plan Sheet L-4 shows 1 accessible space but does not show a necessary walkway in front of parking space and out of drive area. Also, existing paving condition is not barrier-free so accessible parking zone should be repaved. Existing paved parking lot gets restriped. Estimated grading/paving area for parking spaces, walkways and APPM pad = 640 square feet.
4. Goat Rock South: 112 total parking spaces requires 5 accessible spaces including 1 van accessible stall. Site Plan Sheet L-5 shows 5 accessible spaces. Estimated grading/paving area for walkways and APPM pad = 300 square feet.
5. Goat Rock North: 65 total parking spaces requires 3 accessible spaces including 1 van accessible stall. Site Plan Sheet L-6 shows 3 accessible spaces. Existing paved parking lot gets slightly reconfigured and restriped. Estimated grading/paving area for walkways and APPM pad = 240 square feet.
6. Arched Rock View: 26 total parking spaces requires 2 accessible spaces including 1 van accessible stall. Site Plan Sheet L-7 shows 2 accessible spaces. Existing paved parking lot

gets restriped. Estimated grading/paving area for walkways and APPM pad = 240 square feet.

7. Stump Beach: Existing gravel parking lot is not scheduled for paving. If it were paved and striped it could offer between 16 and 20 total parking spaces which would require 1 accessible parking space including 1 van accessible stall. Site Plan Sheet L-8 shows 1 accessible space. Site Plan Sheet L-8 also shows a new single-occupancy restroom building. Estimated grading/paving area for parking spaces, walkways, restroom building and APPM pad = 750 square feet.

The cumulative grading/paving area for the proposed project is roughly 5,860 square feet. To construct the ADA parking spaces and walkways to the strict tolerances for allowable slopes Civil Engineering Drawings will be necessary. The building permit process should be defined by the Coastal Commission's review of the application in order to have the checks and balances for a Code-complying outcome. California Civil Code Section 55.53 states that a local agency shall employ or retain a building inspector who is a Certified Access Specialist (CASp) to conduct plan permitting and construction inspection for compliance with State construction-related accessibility standards.

*Spencer Nilson,*

Spencer Nilson

AIA (American Institute of Architects), CCS (Certified Construction Specifier)

Sonoma Coast Surfrider Chair



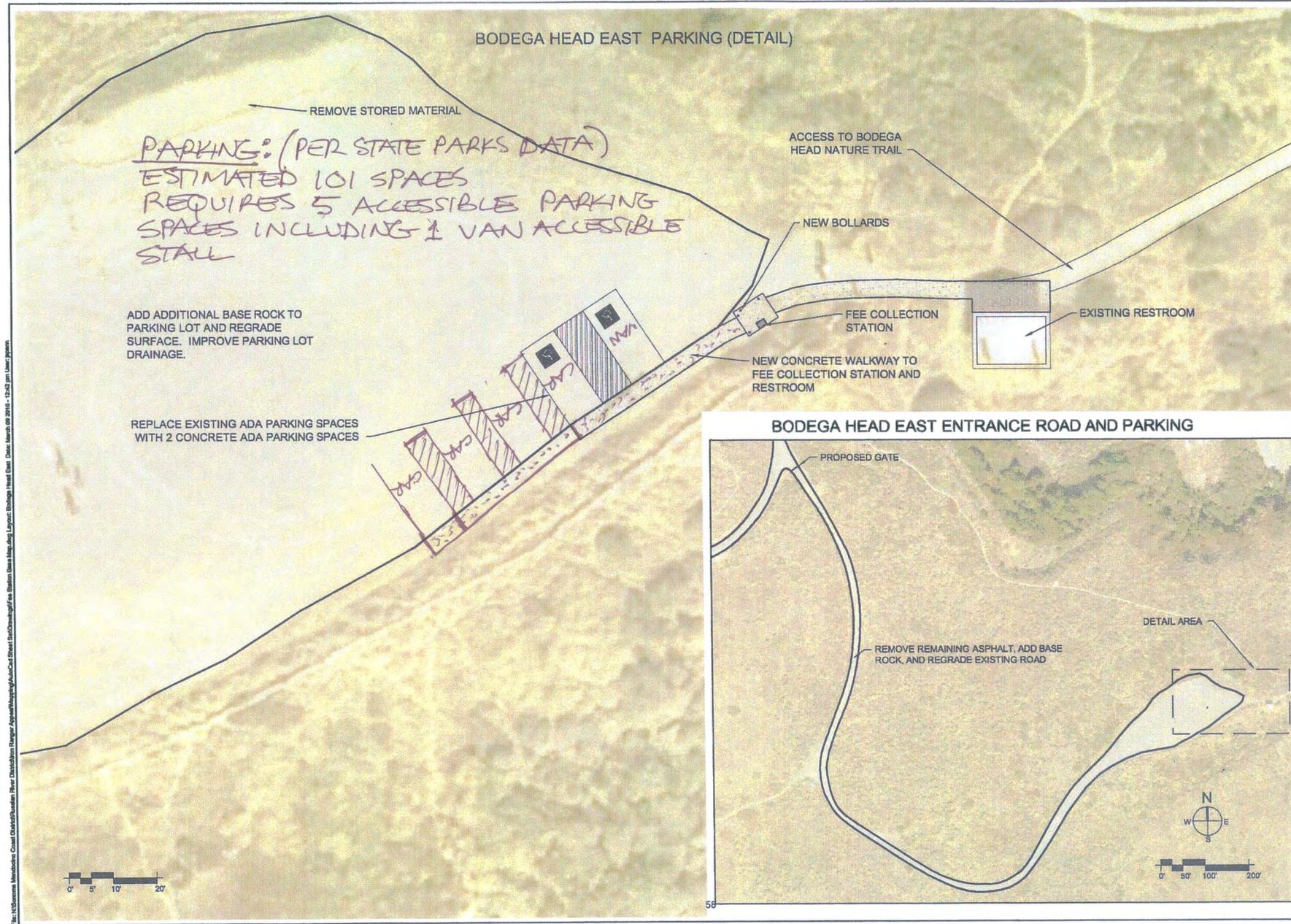
SONOMA-MENDOCINO DISTRICT  
25381 STEELHEAD BLV  
Duncan Mills, CA  
95430

CALIFORNIA STATE PARKS - APPROVED  
Approval of this plan does not constitute approval of any ordinance of deviation from applicable regulations. Final approvals are subject to field inspection. One set of approval plans shall be available on the project site at all times.  
Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
DPR ACCESS COMPLIANCE REVIEW  
ACCESSIBILITY SECTION  
CERTIFICATION # \_\_\_\_\_  
Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
ACCESSIBILITY COMPLIANCE AND STATE FIRE MARSHAL SERVICE OPINIONS ARE OBLIGATORY TO THE DEPARTMENT OF PARKS AND RECREATION SERVICE CENTER.  
DESIGNED: G. SHANNON  
DRAWN: SHANNON/SPAN  
CHECKED: SHANNON/SPAN  
DATE: 3/1/16

| REVISIONS |    |
|-----------|----|
| 1         | DA |

SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS  
**BODEGA HEAD PARKING (EAST)**

DRAWING NO. XXXXX.XXX  
SHEET NO. L-1  
X OF X



File: \\S:\sonoma\workshops\Costa\BodegaHead\River\Drawings\Map\AUCut\Sheet\Drawings\AUCut\Sheet\Drawings\Layout\BodegaHead\Detail Date: March 09 2016 11:52:02 am User: gshannon



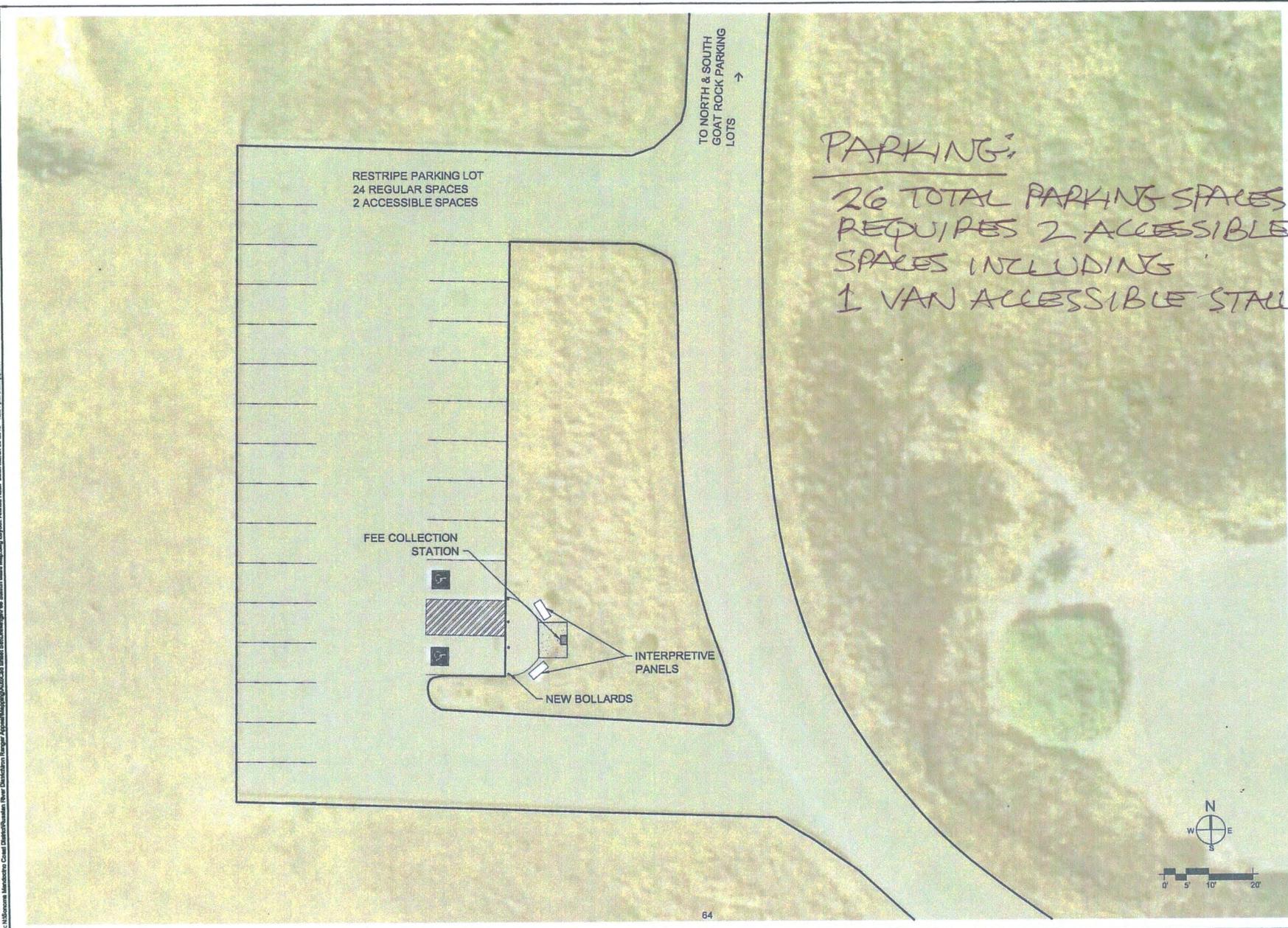








File: \\MS000000\Manochev\Coast State Park\Plan\A-2-SON-13-0219\A-2-SON-13-0219-001.dwg Plot Date: March 02 2018 - 12:51 pm User: jshannon



CALIFORNIA STATE PARKS - APPROVED

Approval of this plan does not authorize or approve any violation of conditions of development from applicable regulations. Final approval is subject to field inspection. One set of approved plans shall be available on the project site at all times.

Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_

DPR ACCESS COMPLIANCE REVIEW  
ACCESSIBILITY SECTION  
CERTIFICATION # \_\_\_\_\_

Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_

ACCESSIBILITY COMPLIANCE AREA OF THE FIRE MANDATED, GRASSY, OPENLAND AND DEVELOPED TO THE DEPARTMENT OF PARKS AND RECREATION, NORTHERN SERVICE CENTER.

DESIGNED: G. SHANNON  
DRAWN: SHANNON/SPANN  
CHECKED: SHANNON/SPANN  
DATE: 3/1/18

| REVISIONS | DATE |
|-----------|------|
|           |      |
|           |      |

SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS  
ARCHED ROCK PARKING

DRAWING NO.  
XXXXX.XXX

SHEET NO.  
L-7  
X OF X



**From:** [ceaview63@comcast.net](mailto:ceaview63@comcast.net)  
**To:** [Cave.Nancy@Coastal](mailto:Cave.Nancy@Coastal); [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Cc:** [Ainsworth.John@Coastal](mailto:Ainsworth.John@Coastal); [Carl.Dan@Coastal](mailto:Carl.Dan@Coastal)  
**Subject:** Re: Sonoma Coast Surfrider Comments to CCC on SP Fee Proposal  
**Date:** Monday, March 28, 2016 11:23:47 AM  
**Attachments:** [SCSF CCC Comments for 4-13-16.docx](#)  
[Observations on ADA grading.docx](#)  
[State Parks Parking Lot Site Plans.pdf](#)

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Dear Nancy

Please find attached comments from Sonoma Coast Surfrider Foundation recommending denial of DPR's Day Use Parking Fee Collection Devise Proposal. Included in the attachments are comments and diagrams regarding observations on ADA compliance for the proposed areas. I hope this is of help in preparing staff recommendations and finalizing your report.

Sincerely,

Cea Higgins

Policy & Volunteer Coordinator

Sonoma Coast Chapter of Surfrider Foundation



*The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. The Surfrider Foundation now maintains over 90 chapters and 250,000 members, supporters, and activists in the U.S.*

March 22, 2016

Attention: Nancy Cave, District Manager  
North Central Coastal District  
California Coastal Commission  
Re: A-2-SON-13-0219  
California State Parks' Proposed Fee Collection on the Sonoma Coast

The Sonoma Coast Chapter of the Surfrider Foundation recommends denial of the State Park's proposal to implement fees at Bodega Head, Shell Beach, Goat Rock State Beach, & Stump Beach parking area at Salt Point State Beach Park. Surfrider has enjoyed a longstanding cooperative relationship with Department of Parks & Recreation; however our organization's mission to preserve coastal access and resources prevents us from supporting this proposal because the submitted proposal:

- Proposal provides inadequate information of the specifics of the project or any analysis of the impacts and fails to meet both CEQA and Coastal Act requirements,
- Is a violation of public access provisions of the Coastal Act,
- Contains numerous inconsistencies and unsubstantiated data to support DRP's claims, and
- Is the result of a flawed public process

**Inadequate CEQA analysis:** While we recognize that the Coastal Commission's staff report is used as the equivalent to CEQA, the fact that the required information and analysis necessary for complete

disclosure is not available to the commission's staff requires that this project be denied. The 2012 exemption for the original proposal submitted to Sonoma County PRMD which is now being re-utilized by DPR to satisfy CEQA guidelines in this current proposal did not account for the grading or paving necessary to reach ADA compliance, did not account for the change in intensity or density of use that would result from imposition of fees, did not identify natural resources to be managed or protected in the fee areas, and did not identify impacts to natural resources as a result of new fees.

Therefore, if the original CEQA exemption was determined to be inadequate to meet the actual scope of the original proposed project, there is no possibility that it could be adequate for the current proposal which now includes ADA compliance and claims of the necessity of fees to manage resources.

The original Notice of Exemption described the nature and purpose of the project as:

*“...installing 14 self-pay stations and fee signage within Salt Point and Sonoma Coast State Parks. Installation consists of; excavation of holes (maximum 3’ depth X 2’ width), iron rangers set in concrete and sign posts in crushed rock and backfilled with native soil.”*

This description does not include the scope of development involved in grading/paving for ADA compliant parking and pathways or the impacts associated with this level of development which should be analyzed as part of CEQA review. The project description in this revised proposal now includes a provision that includes ADA accessible parking and routes between the accessible parking spaces and fee collection stations. §3.1 of the current proposal under Project Description now acknowledges the physical design features required for *“Construction of the appropriate number of accessible parking spaces commensurate with parking lot capacity”* & *“Construction of ADA compliant concrete paths to connect accessible parking with fee stations.”* **§5.3. ADA Accessibility provides:** *“Each project undertaken by State Parks must be designed and implemented to comply with the Americans with Disabilities Act.”*

However, there is no analysis of the level of grading or paving required and the impacts to coastal resources from the grading. Without such information the impacts to coastal resources cannot be determined. In addition, the current State Park Site plans do not fully meet ADA compliance requirements. DPR currently fails to provide individuals with disabilities adequate access to the Sonoma Coast.



(See attached State Parks Site Plan analysis with noted deficiencies and comments regarding ADA compliance requirements).

Therefore, a complete analysis of the impacts of grading and paving to achieve ADA compliance must be conducted as part of the project’s analysis prior to approval of a permit.

Natural Resources:

The original justifications for an exemption were listed as:

*“project consists of construction and location of limited numbers of new, small facilities, minor public alterations.....and construction or placement of minor structures accessory to (and appurtenant to) existing facilities included as “installation of signs” and “installation of fee collection devices”*

The current proposal in § 1.0 states that *“The proposed project would provide State Parks the ability to more effectively manage vehicular parking during peak use periods on up to 8 existing day use parking areas in Sonoma Coast State Park and Salt Point State Park, as necessary to better accommodate use and prevent deterioration of natural resources”* however there is no analysis of what natural resources are in a given area, where these unidentified resources are located in relation to parking areas, what impacts public use has on those unspecified resources, or how limiting access will protect the unspecified resources.

Therefore, an analysis that comprehensively identifies natural resources to be protected must be conducted as part of any submittal to the Coastal Commission and completed prior to approval of the States Parks proposal. Without such information a determination of the justification under the Coastal Act for imposition of fees based on the necessity to protect natural resources is not possible.

## **Public Access & Coastal Act Compliance:**

The Sonoma Coast is a “car dependent for access” coastline. There exists no viable public transportation, no urban areas adjacent to coastal access, and no safe means of access by biking or walking. In order to visit the Sonoma Coast beaches, one has to drive and park. Charging for parking is charging to access the coast.

The Coastal Act provides:

•**Section 30210:** Access: In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted and recreational opportunities, shall be provided for all the people...

•**Section 30213:** Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided.

Revenue generation is not legally recognized as a factor in the Coastal Act to limit public access and the imposition of parking fees for the purposes of revenue generation is insufficient justification on its own to limit maximum access opportunities to the coast. DPR claims under §2.5 that newly implemented fees would enhance public access by providing better services and amenities.

As reported in the Commission’s “**Appeal Staff Report; Substantial Issue Determination**” dated April 3, 2015: “...it is not so clearly demonstrated that fees collected under State Parks’ proposed Sonoma Coast project would result in proportionate increases in services that would enhance public access at the very same State Park units on the Sonoma Coast” unless “Parks can demonstrate that there is direct connection between the fees proposed through the denied project and resultant actions/improvements at Sonoma County coastal State Parks units” (page 15)

DPR has failed to show this connection in the current proposal or how they will meet target revenue goals that would result in funds generated from fees actually being utilized in the areas where fees will be implemented. **Public Resource Code 5010.7** requires that funds must be used towards further “fee generating” projects rather than applied to deferred maintenance or enhancing services throughout the Park including those not generating income. In fact, under §2.5 DPR states that “fees collected at state park units are deposited in the State Parks and Recreation fund which is **available upon appropriation by the legislature**”. There is no guarantee that this will occur nor any guarantee, if appropriated, will be spent at the locations generating the income.

Additionally, the current proposal advocates that fees will be used to limit public access as a means to protect coastal resources. In § 4.3 **Consistency with the California Coastal Act**, DPR states that the revised plan will “*maintain maximum public access*”. How can limiting the number of parking spaces and eliminating free ones maintain public access when this stretch of coast can only be reached by the use of private cars? This statement is also inconsistent with the stated goal of the project to reduce impacts on ESHA by reducing over-all public access and use.

**§5.1 ESHA:** Fees will be utilized “as a tool to achieve that balance. If overuse results in resource degradation, the plan calls for implementation of measures including: facility design; installation of barriers; surface treatments; area or facility closure; change in access locations, or redirection of visitors to other areas. Other methods include regulations including limiting the number of people, location or time of use.” DPR fails to explain any of the specifics of the implementation measures or how they would reduce resource degradation rather than expand it by creating new, uncontrolled parking areas. The only method appears to be reduction in usages, which is totally inconsistent with both the Coastal Act and DPR's own statement in § 5.5 where they specifically state that after an initial decrease in attendance the attendance will "rebound". If the primary means to reduce resource degradation is by reducing public use and such use "rebounds" then there will be no benefit to the resources. In fact, by creating new areas which the public will use when their current free parking areas are closed to them, the net impact to coastal resources will be a negative one. DPR's suggestion that those parking along several of the unpaved areas will be subject to payment of fess is without any clue as to how that would be achieved

Therefore, it is difficult to reconcile DPR’s conflicting claims that fees enhance public access while at the same time limiting public access.

#### Disproportionate Impact to Youth, Elderly, and Low Income

The current proposal states under § 1.5 **Economic Impact** that “*Household incomes for visitors are relatively high with 57% earning over \$75,000 annually and only 15% earning less than \$40,000.*” However there is no citation that verifies the source of these statistics nor any indication if it includes the household incomes for the visitors from the San Joaquin and Sacramento Valleys which it states under §1.5 make up the majority of users. Sonoma Coast Surfrider also challenges this assertion by DPR as it is inconsistent with our observations as well as data available on demographics of visitors to the coast. According to Measure of America “A Portrait of Sonoma County” (<http://www.measureofamerica.org/sonoma/>), the 2014 median earnings, the main gauge of material living standards in this report, are \$30,214 annually in Sonoma County which is on par with earnings in California which is significantly lower than what DPR reports.

A significant portion of users to the coast are minorities, low income, youth, and the elderly and not the affluent as portrayed in DPR statistics and consist of both a local population as well as inland visitors.

State Parks responds to concerns about disproportionate impacts to these communities with the offer of special passes to offset these impacts. The current special & discounted passes available are inadequate in offsetting the impacts to the groups they purportedly serve.

For example:

1. “GOLDEN POPPY VEHICLE DAY USE ANNUAL PASS – the lowest price pass available costs \$125.00 yet is not valid at the high demand Southern California Beach Parks and admittance and use with the pass is still subject to available space.
2. DISABLED DISCOUNT PASS –costs \$3.50; however, this pass only entitles the bearer to a 50% discount for vehicle day use. Those with physical disabilities will require a path of travel from an ADA compliant parking space to the APM fee collection machine and still need to afford ½ the fee.
3. DISTINGUISHED VETERAN PASS - No Fee (Lifetime Pass) only applies to “honorably discharged” veterans and excludes veterans who are “generally discharged under honorable conditions”.
4. LIMITED USE GOLDEN BEAR PASS –costs \$20.00 for seniors (persons 62 years of age or older) but only works during Non-Peak Season so **can’t be used during summer or holidays.**
5. GOLDEN BEAR PASS – costs \$5.00 for any qualifying person. To qualify a single person must be making less than \$11,328 or \$21,012 for married persons and must submit a tax return and get a sign off from their caseworker if receiving SSI. These rates are less than minimum wage and anyone earning more that this is not eligible for the discounted pass.

According to realistic incomes levels of Sonoma Coast State beach users and visitors there is a significant portion of the population that falls between qualifying for these special passes and those having enough disposable income to pay fees to access the coast. The GOLDEN BEAR PASS does not provide any help for those who need it the most and the application process is difficult and degrading. The annual income level cap means that only those who cannot afford a car might be able to get it. Those who are working at minimum wage and need it the most do not qualify. Even when qualifying, public access is limited by the conditions of the passes themselves and the proposal’s aims to limit access even for pass holders. Also DPR’s website to apply for special passes, even though available in other languages, does not have applications available for the special passes in any other language but English.

### Negative Precedent:

The Commission determined that the justification for finding substantial issue to remove jurisdiction from Sonoma County in April 2015 was because the fee proposal had STATEWIDE implication and that “*these types of statewide issues warrant the Commissions involvement*”. Utilizing this basis for their decision means that the current proposal and result in Sonoma County has the potential to set statewide precedent which will be followed along the entire coast of California. Approval of fees in Sonoma County paves the way to implement fees at unpaved parking areas with minimal amenities through-out the California coastline currently free and providing alternative access to the coast for those that cannot afford to pay for higher developed coastal access lots. The negative and disproportionate impact to public access which the Coastal Act exists to prevent is at issue with this proposal. DPR has already applied for the right to implement fees at undeveloped parking areas in Mendocino County.

### Failure to Comply with the Provisions of the Certified LCP

DPR states in §4.2 that the project is consistent with the Sonoma County LCP however, the County in its analysis made it clear that there are numerous provisions of the LCP that the project does not comply with. In particular, DPR states that the LCP merely states "No change" to the current access available and that this does not include the imposition of fees. However, under the Coastal Act any change in the density or intensity of use is considered development. Therefore the project is considered to be development under the Coastal Act and "no change" means no change in development. Any new development is thus inconsistent with the LCP and requires an amendment to the LCP.

### Inconsistencies and Unsubstantiated Data in Proposal of Concern:

- **§1.4 Visitor Data** states that monitoring of vehicle counts utilizing TRAFx data counters to establish baseline visitation data began in May 2015. Prior to this time DPR has repeatedly stated in public hearings that baseline data did not exist. The proposal; however, includes a chart in **§1.3 Visitation to Sonoma Coast State Park** showing “free day use” statistics for fiscal years beginning 2000/2001 through 2013-2014 without explaining how that data was determined or arrived at. In addition, DPR states that the “method of tracking” does not identify how many vehicles enter versus exit in an hour and only provides the raw data of vehicles triggering a counter.” What they do not acknowledge is how many vehicles are entering and exiting without remaining or actually using the area. The visitation numbers reported are ambiguous and unverified however they are being relied upon to determine revenue goals and justifying reasoning to limit access.

- **§1.4 Visitor Data** states that on certain heavily impacted days at Bodega Head there are more vehicles visiting the Park than parking spaces available. What DPR fails to mention is that they have closed Bodega Head East Lot with 100 parking spaces for over 4 years and therefore channeled all cars to the Bodega West lot. All data gathered for Bodega Head and the impacts of peak use reported are inaccurate as there are no traffic counts for utilization of Bodega Head East Parking lot.
- In **Appendix A "Parking Overview in Sonoma Coast State Park and Salt Point State Park"** DPR indicates 2,414 existing parking stalls. This statistic is being used in **§ 2.1 Existing Conditions** to help support the statement that DPR is challenged to staff and maintain these areas with current revenue generation. We want to point out that 482 "parking stalls" (20%) of the total number are roadside shoulders barely a car width and simply dirt without vegetation. Many of these shoulders are in obscure locations such as "Cemetery" and "Orchard" at Fort Ross State Historic Park and several miles from beach access at the proposed new fee locations. It is a distortion of actual circumstances to imply that they offer viable free parking opportunities for the general populace using Sonoma Coast State Beaches or adding to DPR's hardship of park staffing and maintenance. It should also be noted that DPR recommends installing signage at roadside parking adjunct to fee'd parking lots to inform people there is a fee to park there as well.
- In **Appendix A Parking Overview in Sonoma Coast State Park and Salt Point State Park** DPR depicts a graph which shows that Salt Point lot currently has fees in 82% of developed parking areas, will fee under the proposal an additional 11% when adding the "Stump Beach lot" and leave only 7% of possible access to the coast as free. The inclusion of Stump Beach as a fee location leaving only 7% free access opportunities not only exemplifies DPR's failure to account for public access impacts but also shows that DPR changes the definition of "developed" and "undeveloped" throughout the proposal. DPR classifies Stump Beach lot as "*developed*" although **Appendix F Associated Projects** reveals that the restroom is non-functioning, there is no potable water, and grading/paving would be required for ADA compliance. DPR fails to define the parameters of what constitutes "developed" v. "undeveloped lots" and "amenities provided" is inconsistent and malleable to suit DPR's justifications for implementing fees.
- DPR claims that installation of the fee collection device in certain locations will not induce people to park outside of the day use parking area in areas that have never seen parking, to avoid paying fees because the shoulders on SR 1 in the vicinity have "*dense vegetation, roadside ditches, or other topography that severely limits the ability for creation of shoulder parking.*" Historic practices show otherwise and visitors avoiding fees will continue to seek out dangerous

parking or parking in sensitive habitat to avoid fees resulting in additional resource damage which is not accounted for in any analysis of the net impact of the project.



- **§2.7 “Traffic and Parking Impacts”** DPR recognizes that there *“a few locations where patron may elect to park informally and walk-in rather than pay a day-use fee, creating new parking areas and associated social trails through sensitive habitats”* and cites one of these locations as Shell Beach. Later in the proposal in **§5.1 ESHA** DPR states that at Shell Beach the *“fee collection devices will not induce people to park outside of the day use areas that have never seen parking, to avoid fees”* If DPR is already aware of areas where volunteer trails through sensitive areas exists then rather than utilizing this as a justification that there are “no new” impacts, DPR should be seeking ways to protect these areas rather than increase their usage by adjacent installation of fee collection.
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Failure to meet Commission’s conditions in other areas where fees have been implemented:

In other areas of California where the Commission has approved fee permits, approval was conditioned upon DPR “*monitoring and periodically reviewing the implementation of any new fee program including impacts on coastal access and annually reporting to the commission available and relevant monitoring data and evaluation including but not limited to daily attendance and impacts to public access.*” To date, DPR has failed to comply with these reporting requirements and no evaluation has been conducted to show if the higher fees had an impact on coastal access or what groups were most affected. **These studies need to be conducted by Parks and evaluated by the Commission before further fees are approved.**

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**Public & Stakeholder Process:**

While appreciating State Parks efforts to gather public and stakeholder input, the process was flawed because:

- Many affected groups whose access rights will be disproportionately impacted by new fees, such as Latinos, Native Americans, and low & limited income communities were not included in the stakeholder process even though representatives were available and expressed their interest in being included.
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comment as promised to stakeholders prior to the forum and expected by the attendees-this is what caused the contention.

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For the above reasons, Sonoma Coast Surfrider is recommending denial of DPR's de Novo Application.

Thank you,

*Cea Higgins*

Sonoma Coast Surfrider  
Policy and Volunteer Coordinator

*Spencer Nilson*

Sonoma Coast Surfrider  
Chair

## **Observations on ADA grading/paving requirements for State Parks fee proposal:**

After review of State Parks proposed parking improvements and the associated construction I have the following observations regarding ADA parking and pathway requirements:

1. Unpaved gravel lots at Bodega Head East and Bodega Head West pose a conundrum for determining the correct number of accessible parking spaces based on the total number of parking spaces provided. The best solution is to use State Parks own parking capacity data for each location. When this is done it indicates that more accessible parking needs to be provided at each location.
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2. Shell Beach: 38 total parking spaces requires 2 accessible spaces including 1 van accessible stall. Site Plan Sheet L-3 shows the required 2 accessible spaces. Existing paved parking lot gets restriped. Estimated grading/paving area for walkways and APPM pad = 640 square feet.
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4. Goat Rock South: 112 total parking spaces requires 5 accessible spaces including 1 van accessible stall. Site Plan Sheet L-5 shows 5 accessible spaces. Estimated grading/paving area for walkways and APPM pad = 300 square feet.
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The cumulative grading/paving area for the proposed project is roughly 5,860 square feet. To construct the ADA parking spaces and walkways to the strict tolerances for allowable slopes Civil Engineering Drawings will be necessary. The building permit process should be defined by the Coastal Commission's review of the application in order to have the checks and balances for a Code-complying outcome. California Civil Code Section 55.53 states that a local agency shall employ or retain a building inspector who is a Certified Access Specialist (CASp) to conduct plan permitting and construction inspection for compliance with State construction-related accessibility standards.

*Spencer Nilson,*

Spencer Nilson

AIA (American Institute of Architects), CCS (Certified Construction Specifier)

Sonoma Coast Surfrider Chair













File: \\MS000000\Mendocino Coast StatePark\Plan\Draw\ArchRock\ArchRock.dwg Plot Date: March 02 2018 - 12:21 pm User: jsparr



SONOMA-MENDOCINO DISTRICT  
25381 STEELHEAD BLVD  
Duncan Mills, CA  
95430

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CALIFORNIA STATE PARKS - APPROVED  
Approval of this plan does not authorize or approve any violation of conditions of development from applicable regulations. Final approval is subject to field inspection. One set of approved plans shall be available on the project site at all times.

Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_

DPR ACCESS COMPLIANCE REVIEW ACCESSIBILITY SECTION CERTIFICATION #

Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_

ACCESSIBILITY COMPLIANCE AREA OF THE FIRE MANDATED, GRASSY, OPENLAND AND DEVELOPED TO THE DEPARTMENT OF PARKS AND RECREATION, NORTH-RICH SERVICE CENTER.

DESIGNED: G. SHANNON  
DRAWN: SHANNON/SPANN  
CHECKED: SHANNON/SPANN  
DATE: 3/1/18

| REVISIONS | DATE |
|-----------|------|
|           |      |

SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS  
ARCHED ROCK PARKING

DRAWING NO.  
XXXXX.XXX

SHEET NO.  
L-7  
X OF X



**From:** [sonomacoastsurfrider@comcast.net](mailto:sonomacoastsurfrider@comcast.net)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal); [Cave.Nancy@Coastal](mailto:Cave.Nancy@Coastal)  
**Cc:** [Ainsworth.John@Coastal](mailto:Ainsworth.John@Coastal); [Carl.Dan@Coastal](mailto:Carl.Dan@Coastal)  
**Subject:** Re: Sonoma Coast Surfrider Comments to CCC on SP Fee Proposal  
**Date:** Monday, March 28, 2016 11:24:33 AM  
**Attachments:** [SCSF CCC Comments for 4-13-16.docx](#)  
[Observations on ADA grading.docx](#)  
[State Parks Parking Lot Site Plans.pdf](#)

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Dear Nancy

Please find attached comments from Sonoma Coast Surfrider Foundation recommending denial of DPR's Day Use Parking Fee Collection Devise Proposal. Included in the attachments are comments and diagrams regarding observations on ADA compliance for the proposed areas. I hope this is of help in preparing staff recommendations and finalizing your report.

Sincerely,

Cea Higgins

Policy & Volunteer Coordinator

Sonoma Coast Chapter of Surfrider Foundation



*The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. The Surfrider Foundation now maintains over 90 chapters and 250,000 members, supporters, and activists in the U.S.*

March 22, 2016

Attention: Nancy Cave, District Manager  
North Central Coastal District  
California Coastal Commission  
Re: A-2-SON-13-0219  
California State Parks' Proposed Fee Collection on the Sonoma Coast

The Sonoma Coast Chapter of the Surfrider Foundation recommends denial of the State Park's proposal to implement fees at Bodega Head, Shell Beach, Goat Rock State Beach, & Stump Beach parking area at Salt Point State Beach Park. Surfrider has enjoyed a longstanding cooperative relationship with Department of Parks & Recreation; however our organization's mission to preserve coastal access and resources prevents us from supporting this proposal because the submitted proposal:

- Proposal provides inadequate information of the specifics of the project or any analysis of the impacts and fails to meet both CEQA and Coastal Act requirements,
- Is a violation of public access provisions of the Coastal Act,
- Contains numerous inconsistencies and unsubstantiated data to support DRP's claims, and
- Is the result of a flawed public process

**Inadequate CEQA analysis:** While we recognize that the Coastal Commission's staff report is used as the equivalent to CEQA, the fact that the required information and analysis necessary for complete

disclosure is not available to the commission's staff requires that this project be denied. The 2012 exemption for the original proposal submitted to Sonoma County PRMD which is now being re-utilized by DPR to satisfy CEQA guidelines in this current proposal did not account for the grading or paving necessary to reach ADA compliance, did not account for the change in intensity or density of use that would result from imposition of fees, did not identify natural resources to be managed or protected in the fee areas, and did not identify impacts to natural resources as a result of new fees.

Therefore, if the original CEQA exemption was determined to be inadequate to meet the actual scope of the original proposed project, there is no possibility that it could be adequate for the current proposal which now includes ADA compliance and claims of the necessity of fees to manage resources.

The original Notice of Exemption described the nature and purpose of the project as:

*“...installing 14 self-pay stations and fee signage within Salt Point and Sonoma Coast State Parks. Installation consists of; excavation of holes (maximum 3’ depth X 2’ width), iron rangers set in concrete and sign posts in crushed rock and backfilled with native soil.”*

This description does not include the scope of development involved in grading/paving for ADA compliant parking and pathways or the impacts associated with this level of development which should be analyzed as part of CEQA review. The project description in this revised proposal now includes a provision that includes ADA accessible parking and routes between the accessible parking spaces and fee collection stations. §3.1 of the current proposal under Project Description now acknowledges the physical design features required for *“Construction of the appropriate number of accessible parking spaces commensurate with parking lot capacity”* & *“Construction of ADA compliant concrete paths to connect accessible parking with fee stations.”* **§5.3. ADA Accessibility provides:** *“Each project undertaken by State Parks must be designed and implemented to comply with the Americans with Disabilities Act.”*

However, there is no analysis of the level of grading or paving required and the impacts to coastal resources from the grading. Without such information the impacts to coastal resources cannot be determined. In addition, the current State Park Site plans do not fully meet ADA compliance requirements. DPR currently fails to provide individuals with disabilities adequate access to the Sonoma Coast.



(See attached State Parks Site Plan analysis with noted deficiencies and comments regarding ADA compliance requirements).

Therefore, a complete analysis of the impacts of grading and paving to achieve ADA compliance must be conducted as part of the project’s analysis prior to approval of a permit.

Natural Resources:

The original justifications for an exemption were listed as:

*“project consists of construction and location of limited numbers of new, small facilities, minor public alterations.....and construction or placement of minor structures accessory to (and appurtenant to) existing facilities included as “installation of signs” and “installation of fee collection devices”*

The current proposal in § 1.0 states that *“The proposed project would provide State Parks the ability to more effectively manage vehicular parking during peak use periods on up to 8 existing day use parking areas in Sonoma Coast State Park and Salt Point State Park, as necessary to better accommodate use and prevent deterioration of natural resources”* however there is no analysis of what natural resources are in a given area, where these unidentified resources are located in relation to parking areas, what impacts public use has on those unspecified resources, or how limiting access will protect the unspecified resources.

Therefore, an analysis that comprehensively identifies natural resources to be protected must be conducted as part of any submittal to the Coastal Commission and completed prior to approval of the States Parks proposal. Without such information a determination of the justification under the Coastal Act for imposition of fees based on the necessity to protect natural resources is not possible.

## **Public Access & Coastal Act Compliance:**

The Sonoma Coast is a “car dependent for access” coastline. There exists no viable public transportation, no urban areas adjacent to coastal access, and no safe means of access by biking or walking. In order to visit the Sonoma Coast beaches, one has to drive and park. Charging for parking is charging to access the coast.

The Coastal Act provides:

•**Section 30210:** Access: In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted and recreational opportunities, shall be provided for all the people...

•**Section 30213:** Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided.

Revenue generation is not legally recognized as a factor in the Coastal Act to limit public access and the imposition of parking fees for the purposes of revenue generation is insufficient justification on its own to limit maximum access opportunities to the coast. DPR claims under §2.5 that newly implemented fees would enhance public access by providing better services and amenities.

As reported in the Commission’s “**Appeal Staff Report; Substantial Issue Determination**” dated April 3, 2015: “...it is not so clearly demonstrated that fees collected under State Parks’ proposed Sonoma Coast project would result in proportionate increases in services that would enhance public access at the very same State Park units on the Sonoma Coast” unless “Parks can demonstrate that there is direct connection between the fees proposed through the denied project and resultant actions/improvements at Sonoma County coastal State Parks units” (page 15)

DPR has failed to show this connection in the current proposal or how they will meet target revenue goals that would result in funds generated from fees actually being utilized in the areas where fees will be implemented. **Public Resource Code 5010.7** requires that funds must be used towards further “fee generating” projects rather than applied to deferred maintenance or enhancing services throughout the Park including those not generating income. In fact, under §2.5 DPR states that “fees collected at state park units are deposited in the State Parks and Recreation fund which is **available upon appropriation by the legislature**”. There is no guarantee that this will occur nor any guarantee, if appropriated, will be spent at the locations generating the income.

Additionally, the current proposal advocates that fees will be used to limit public access as a means to protect coastal resources. In § 4.3 **Consistency with the California Coastal Act**, DPR states that the revised plan will “*maintain maximum public access*”. How can limiting the number of parking spaces and eliminating free ones maintain public access when this stretch of coast can only be reached by the use of private cars? This statement is also inconsistent with the stated goal of the project to reduce impacts on ESHA by reducing over-all public access and use.

**§5.1 ESHA:** Fees will be utilized “as a tool to achieve that balance. If overuse results in resource degradation, the plan calls for implementation of measures including: facility design; installation of barriers; surface treatments; area or facility closure; change in access locations, or redirection of visitors to other areas. Other methods include regulations including limiting the number of people, location or time of use.” DPR fails to explain any of the specifics of the implementation measures or how they would reduce resource degradation rather than expand it by creating new, uncontrolled parking areas. The only method appears to be reduction in usages, which is totally inconsistent with both the Coastal Act and DPR's own statement in § 5.5 where they specifically state that after an initial decrease in attendance the attendance will "rebound". If the primary means to reduce resource degradation is by reducing public use and such use "rebounds" then there will be no benefit to the resources. In fact, by creating new areas which the public will use when their current free parking areas are closed to them, the net impact to coastal resources will be a negative one. DPR's suggestion that those parking along several of the unpaved areas will be subject to payment of fess is without any clue as to how that would be achieved

Therefore, it is difficult to reconcile DPR’s conflicting claims that fees enhance public access while at the same time limiting public access.

#### Disproportionate Impact to Youth, Elderly, and Low Income

The current proposal states under § 1.5 **Economic Impact** that “*Household incomes for visitors are relatively high with 57% earning over \$75,000 annually and only 15% earning less than \$40,000.*” However there is no citation that verifies the source of these statistics nor any indication if it includes the household incomes for the visitors from the San Joaquin and Sacramento Valleys which it states under §1.5 make up the majority of users. Sonoma Coast Surfrider also challenges this assertion by DPR as it is inconsistent with our observations as well as data available on demographics of visitors to the coast. According to Measure of America “A Portrait of Sonoma County” (<http://www.measureofamerica.org/sonoma/>), the 2014 median earnings, the main gauge of material living standards in this report, are \$30,214 annually in Sonoma County which is on par with earnings in California which is significantly lower than what DPR reports.

A significant portion of users to the coast are minorities, low income, youth, and the elderly and not the affluent as portrayed in DPR statistics and consist of both a local population as well as inland visitors.

State Parks responds to concerns about disproportionate impacts to these communities with the offer of special passes to offset these impacts. The current special & discounted passes available are inadequate in offsetting the impacts to the groups they purportedly serve.

For example:

1. “GOLDEN POPPY VEHICLE DAY USE ANNUAL PASS – the lowest price pass available costs \$125.00 yet is not valid at the high demand Southern California Beach Parks and admittance and use with the pass is still subject to available space.
2. DISABLED DISCOUNT PASS –costs \$3.50; however, this pass only entitles the bearer to a 50% discount for vehicle day use. Those with physical disabilities will require a path of travel from an ADA compliant parking space to the APM fee collection machine and still need to afford ½ the fee.
3. DISTINGUISHED VETERAN PASS - No Fee (Lifetime Pass) only applies to “honorably discharged” veterans and excludes veterans who are “generally discharged under honorable conditions”.
4. LIMITED USE GOLDEN BEAR PASS –costs \$20.00 for seniors (persons 62 years of age or older) but only works during Non-Peak Season so **can’t be used during summer or holidays.**
5. GOLDEN BEAR PASS – costs \$5.00 for any qualifying person. To qualify a single person must be making less than \$11,328 or \$21,012 for married persons and must submit a tax return and get a sign off from their caseworker if receiving SSI. These rates are less than minimum wage and anyone earning more that this is not eligible for the discounted pass.

According to realistic incomes levels of Sonoma Coast State beach users and visitors there is a significant portion of the population that falls between qualifying for these special passes and those having enough disposable income to pay fees to access the coast. The GOLDEN BEAR PASS does not provide any help for those who need it the most and the application process is difficult and degrading. The annual income level cap means that only those who cannot afford a car might be able to get it. Those who are working at minimum wage and need it the most do not qualify. Even when qualifying, public access is limited by the conditions of the passes themselves and the proposal’s aims to limit access even for pass holders. Also DPR’s website to apply for special passes, even though available in other languages, does not have applications available for the special passes in any other language but English.

### Negative Precedent:

The Commission determined that the justification for finding substantial issue to remove jurisdiction from Sonoma County in April 2015 was because the fee proposal had STATEWIDE implication and that “*these types of statewide issues warrant the Commissions involvement*”. Utilizing this basis for their decision means that the current proposal and result in Sonoma County has the potential to set statewide precedent which will be followed along the entire coast of California. Approval of fees in Sonoma County paves the way to implement fees at unpaved parking areas with minimal amenities through-out the California coastline currently free and providing alternative access to the coast for those that cannot afford to pay for higher developed coastal access lots. The negative and disproportionate impact to public access which the Coastal Act exists to prevent is at issue with this proposal. DPR has already applied for the right to implement fees at undeveloped parking areas in Mendocino County.

### Failure to Comply with the Provisions of the Certified LCP

DPR states in §4.2 that the project is consistent with the Sonoma County LCP however, the County in its analysis made it clear that there are numerous provisions of the LCP that the project does not comply with. In particular, DPR states that the LCP merely states "No change" to the current access available and that this does not include the imposition of fees. However, under the Coastal Act any change in the density or intensity of use is considered development. Therefore the project is considered to be development under the Coastal Act and "no change" means no change in development. Any new development is thus inconsistent with the LCP and requires an amendment to the LCP.

### Inconsistencies and Unsubstantiated Data in Proposal of Concern:

- **§1.4 Visitor Data** states that monitoring of vehicle counts utilizing TRAFx data counters to establish baseline visitation data began in May 2015. Prior to this time DPR has repeatedly stated in public hearings that baseline data did not exist. The proposal; however, includes a chart in **§1.3 Visitation to Sonoma Coast State Park** showing “free day use” statistics for fiscal years beginning 2000/2001 through 2013-2014 without explaining how that data was determined or arrived at. In addition, DPR states that the “method of tracking” does not identify how many vehicles enter versus exit in an hour and only provides the raw data of vehicles triggering a counter.” What they do not acknowledge is how many vehicles are entering and exiting without remaining or actually using the area. The visitation numbers reported are ambiguous and unverified however they are being relied upon to determine revenue goals and justifying reasoning to limit access.

- **§1.4 Visitor Data** states that on certain heavily impacted days at Bodega Head there are more vehicles visiting the Park than parking spaces available. What DPR fails to mention is that they have closed Bodega Head East Lot with 100 parking spaces for over 4 years and therefore channeled all cars to the Bodega West lot. All data gathered for Bodega Head and the impacts of peak use reported are inaccurate as there are no traffic counts for utilization of Bodega Head East Parking lot.
- In **Appendix A "Parking Overview in Sonoma Coast State Park and Salt Point State Park"** DPR indicates 2,414 existing parking stalls. This statistic is being used in **§ 2.1 Existing Conditions** to help support the statement that DPR is challenged to staff and maintain these areas with current revenue generation. We want to point out that 482 "parking stalls" (20%) of the total number are roadside shoulders barely a car width and simply dirt without vegetation. Many of these shoulders are in obscure locations such as "Cemetery" and "Orchard" at Fort Ross State Historic Park and several miles from beach access at the proposed new fee locations. It is a distortion of actual circumstances to imply that they offer viable free parking opportunities for the general populace using Sonoma Coast State Beaches or adding to DPR's hardship of park staffing and maintenance. It should also be noted that DPR recommends installing signage at roadside parking adjunct to fee'd parking lots to inform people there is a fee to park there as well.
- In **Appendix A Parking Overview in Sonoma Coast State Park and Salt Point State Park** DPR depicts a graph which shows that Salt Point lot currently has fees in 82% of developed parking areas, will fee under the proposal an additional 11% when adding the "Stump Beach lot" and leave only 7% of possible access to the coast as free. The inclusion of Stump Beach as a fee location leaving only 7% free access opportunities not only exemplifies DPR's failure to account for public access impacts but also shows that DPR changes the definition of "developed" and "undeveloped" throughout the proposal. DPR classifies Stump Beach lot as "*developed*" although **Appendix F Associated Projects** reveals that the restroom is non-functioning, there is no potable water, and grading/paving would be required for ADA compliance. DPR fails to define the parameters of what constitutes "developed" v. "undeveloped lots" and "amenities provided" is inconsistent and malleable to suit DPR's justifications for implementing fees.
- DPR claims that installation of the fee collection device in certain locations will not induce people to park outside of the day use parking area in areas that have never seen parking, to avoid paying fees because the shoulders on SR 1 in the vicinity have "*dense vegetation, roadside ditches, or other topography that severely limits the ability for creation of shoulder parking.*" Historic practices show otherwise and visitors avoiding fees will continue to seek out dangerous

parking or parking in sensitive habitat to avoid fees resulting in additional resource damage which is not accounted for in any analysis of the net impact of the project.



- **§2.7 “Traffic and Parking Impacts”** DPR recognizes that there *“a few locations where patron may elect to park informally and walk-in rather than pay a day-use fee, creating new parking areas and associated social trails through sensitive habitats”* and cites one of these locations as Shell Beach. Later in the proposal in **§5.1 ESHA** DPR states that at Shell Beach the *“fee collection devices will not induce people to park outside of the day use areas that have never seen parking, to avoid fees”* If DPR is already aware of areas where volunteer trails through sensitive areas exists then rather than utilizing this as a justification that there are “no new” impacts, DPR should be seeking ways to protect these areas rather than increase their usage by adjacent installation of fee collection.
- In **§4.3. CONSISTENCY WITH THE CALIFORNIA COASTAL ACT**, DPR interprets **§30214** to mean that there must be some “limits to free and unrestrained access” and that fees are being implemented in an area where there is “Wholesale free-for-all beach access”. However, **§30210** place only four limitations on the requirement for maximum access and the collection of fees is not one of them. Currently on the Sonoma Coast there is not wholesale free access as DPR charges at Bodega Dunes, Wrights Beach, Reef, Fort Ross, Gerstle Cove, Woodside, and Fisk Mill locations which are staffed parks with camping, programming, and other amenities.
- **Appendix D Response to Comment 5** provides that public access will not be limited because “... fees will only be charged during peak use times.” In other portions of the application DPR does not limit the collection of fees to peak times only. DPR does not explain this anywhere in their application.

Failure to meet Commission’s conditions in other areas where fees have been implemented:

In other areas of California where the Commission has approved fee permits, approval was conditioned upon DPR “*monitoring and periodically reviewing the implementation of any new fee program including impacts on coastal access and annually reporting to the commission available and relevant monitoring data and evaluation including but not limited to daily attendance and impacts to public access.*” To date, DPR has failed to comply with these reporting requirements and no evaluation has been conducted to show if the higher fees had an impact on coastal access or what groups were most affected. **These studies need to be conducted by Parks and evaluated by the Commission before further fees are approved.**

In the current proposal DPR claims in §4.5. **Consistency with the 2013 Agreement between State Parks and CCC** that “*State Parks has incorporated all the measures recommended therein in this proposed project*” and that “*to the extent that the approaches are applicable, they have been incorporated into the Revised Fee Proposal.*” DPR does not list specifically which measures or approaches have been integrated into the revised proposal. In addition if DPR has not met the conditions imposed in other areas, there is little reason to believe that conditions will be complied with under this current permit if approved and impacts to public access and environmental resources will most likely not be measured or reported.

**Public & Stakeholder Process:**

While appreciating State Parks efforts to gather public and stakeholder input, the process was flawed because:

- Many affected groups whose access rights will be disproportionately impacted by new fees, such as Latinos, Native Americans, and low & limited income communities were not included in the stakeholder process even though representatives were available and expressed their interest in being included.
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Thank you,

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Sonoma Coast Surfrider Chair



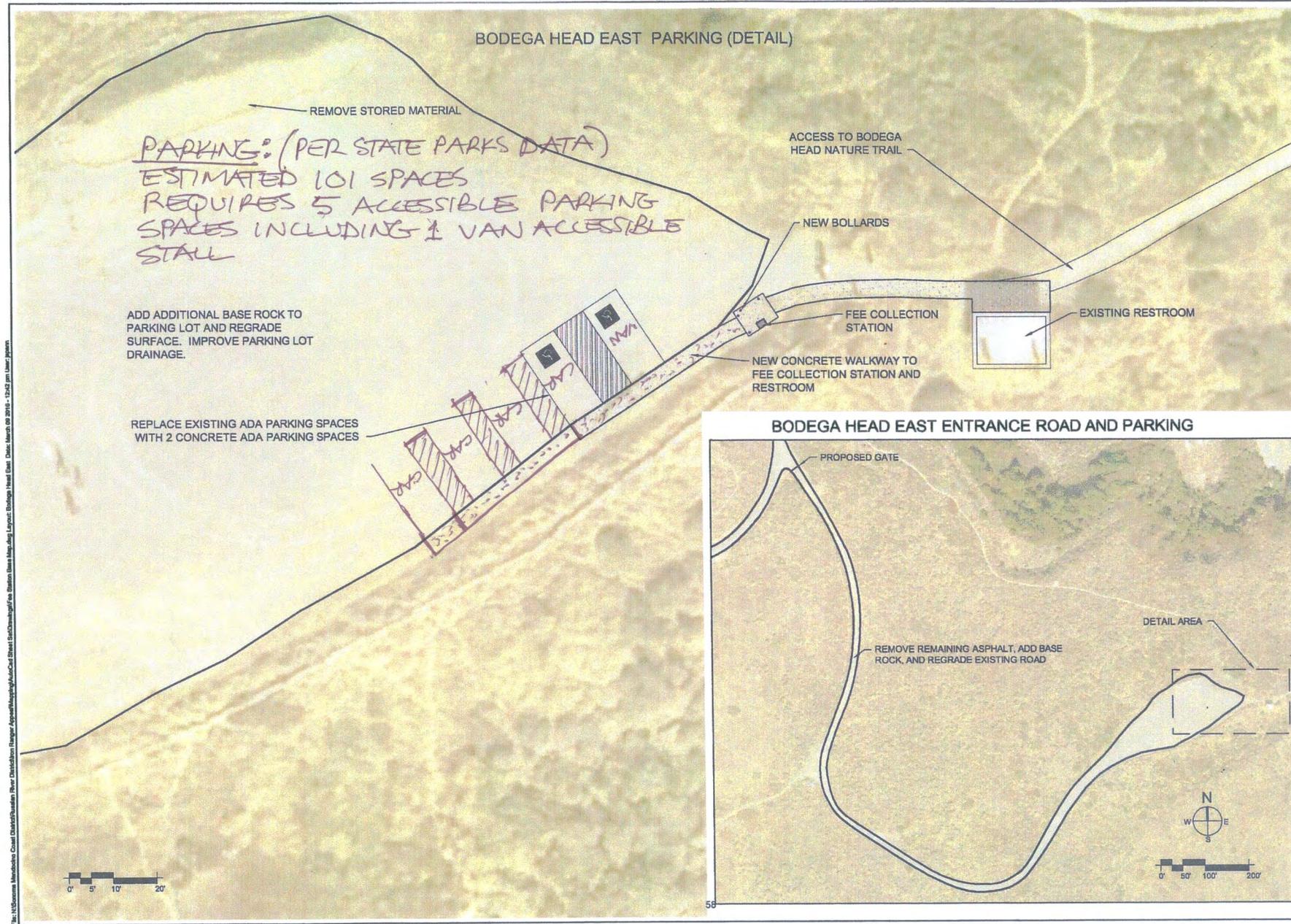
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95430

CALIFORNIA STATE PARKS - APPROVED  
Approval of this plan does not constitute approval of any ordinance of deviation from applicable regulations. Final approvals subject to field inspection. One set of approval plans shall be available on the project site at all times.  
Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
DPR ACCESS COMPLIANCE REVIEW  
ACCESSIBILITY SECTION  
CERTIFICATION # \_\_\_\_\_  
Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
ACCESSIBILITY COMPLIANCE AND STATE FIRE MARSHAL SERVICE ORDINANCES COMPLIANT WITH THE DEPARTMENT OF PARKS AND RECREATION SERVICE CENTER  
DESIGNED: G. SHANNON  
DRAWN: SHANNON/SPAN  
CHECKED: SHANNON/SPAN  
DATE: 3/1/16

| REVISIONS |    |
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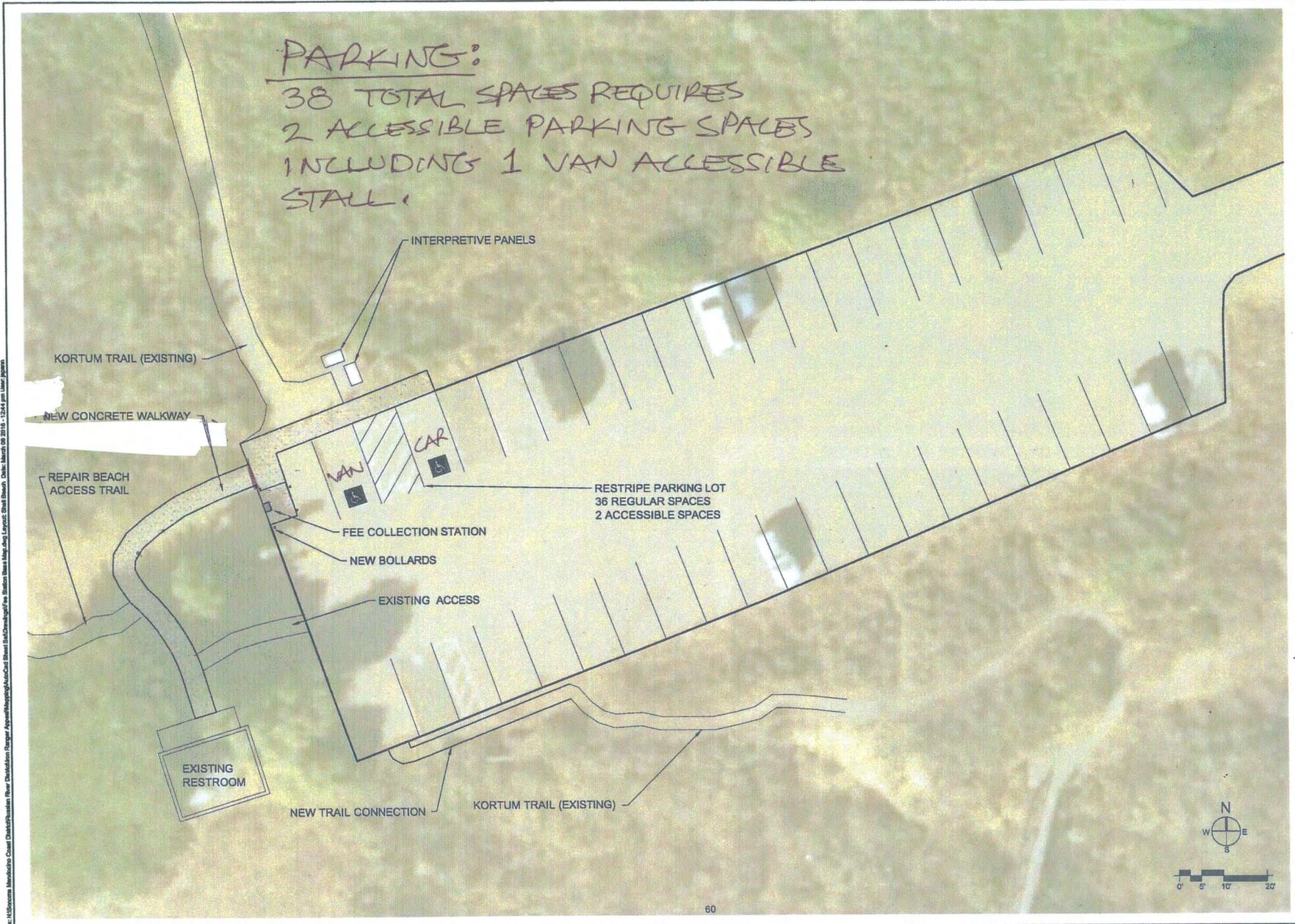
SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS  
**BODEGA HEAD PARKING (EAST)**

DRAWING NO. XXXXX.XXX  
SHEET NO. L-1  
X OF X



File: \\S:\sonoma\workshops\Costa\BodegaHead\River\Drawings\Map\AUCut\Sheet\Drawings\AUCut\Sheet\Drawings\Layout\BodegaHead\Detail Date: March 09 2016 11:52:02 am User: gshannon





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PARKING:  
 38 TOTAL SPACES REQUIRES  
 2 ACCESSIBLE PARKING SPACES  
 INCLUDING 1 VAN ACCESSIBLE  
 STALL.

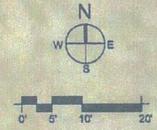


SONOMA-MENDOCINO DISTRICT  
 25381 STEELHEAD BLV  
 Duncan Mills, CA  
 95435

CALIFORNIA STATE FIRE MARSHAL APPROVED  
 Approval of this plan does not authorize or approve any violation of applicable laws or regulations. The approval is subject to field inspection. One set of approved plans shall be available on the project site at all times.  
 Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
 DPR ACCESS COMPLIANCE REVIEW ACCESSIBILITY SECTION CERTIFICATION # \_\_\_\_\_  
 Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
 ACCESSIBILITY COMPLIANCE AND STATE FIRE MARSHAL REVIEW CERTIFICATION AND OFFICIAL OF THE DEPARTMENT OF PARKS AND RECREATION SIGNATURE CENTER  
 DESIGNED: G. SHANNON  
 DRAWN: SHANNONSPAN  
 CHECKED: SHANNONSPAN  
 DATE: 3/1/16

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SONOMA COAST STATE PARK  
 FEE COLLECTION STATIONS  
**SHELL BEACH PARKING**



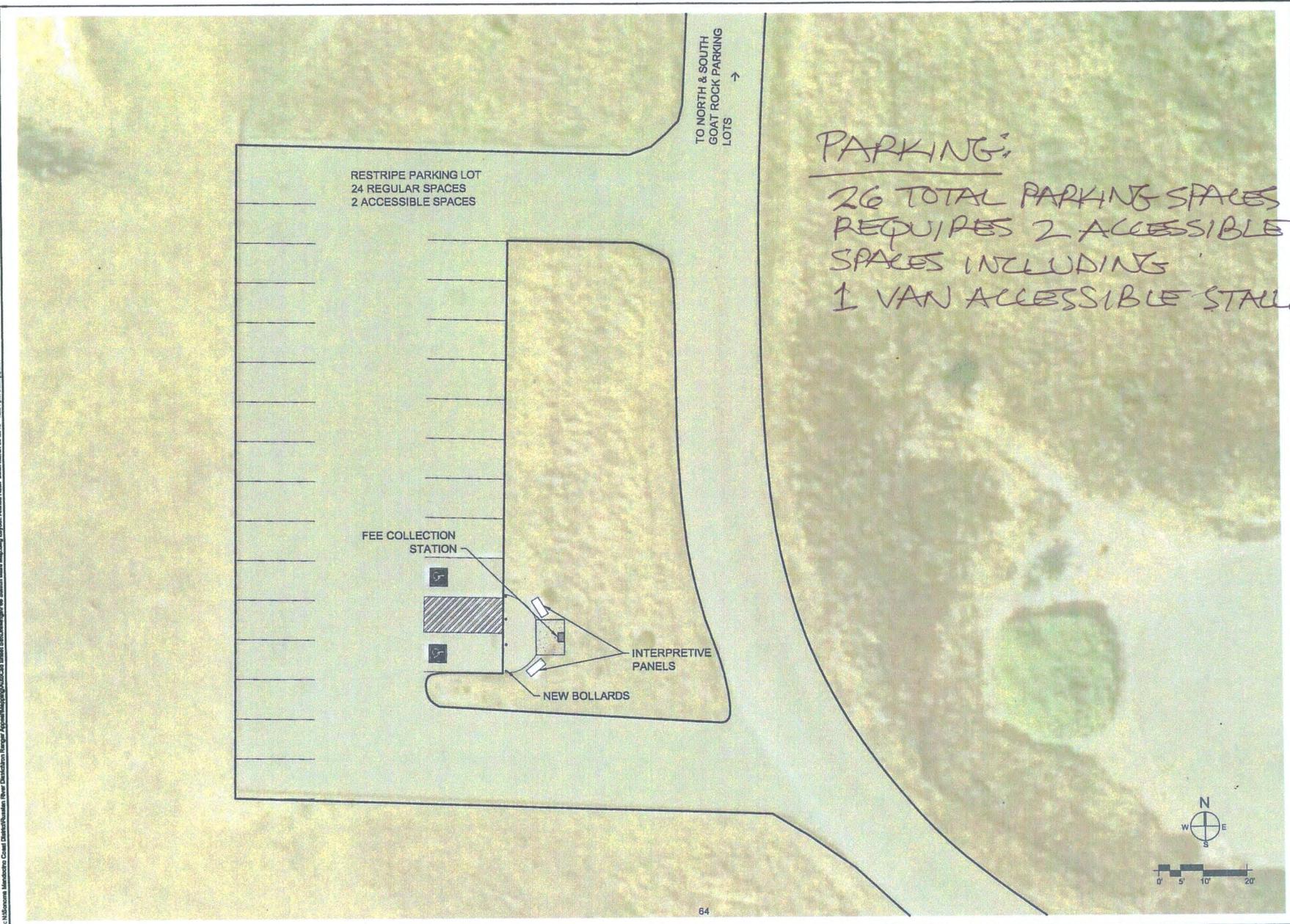
DRAWING NO. XXXXX.XXX  
 SHEET NO. L-3  
 X OF X







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SONOMA-MENDOCINO  
DISTRICT  
25381 STEELHEAD BLVD  
Duncan Mills, CA  
95430

CALIFORNIA STATE PARKS - APPROVED  
Approval of this plan does not authorize or  
approve any violation of conditions of deviation from  
applicable regulations. Final approval is  
subject to field inspection. One set of  
approved plans shall be available on the  
project site at all times.

Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
DPR ACCESS COMPLIANCE REVIEW  
ACCESSIBILITY SECTION  
CERTIFICATION # \_\_\_\_\_

Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
ACCESSIBILITY COMPLIANCE AREA OF THE FIRE  
LANDING, GROUND CONDITIONS AND DEVELOPMENT  
TO THE DEPARTMENT OF PARKS AND RECREATION,  
NORTH-RICHMOND SERVICE CENTER.

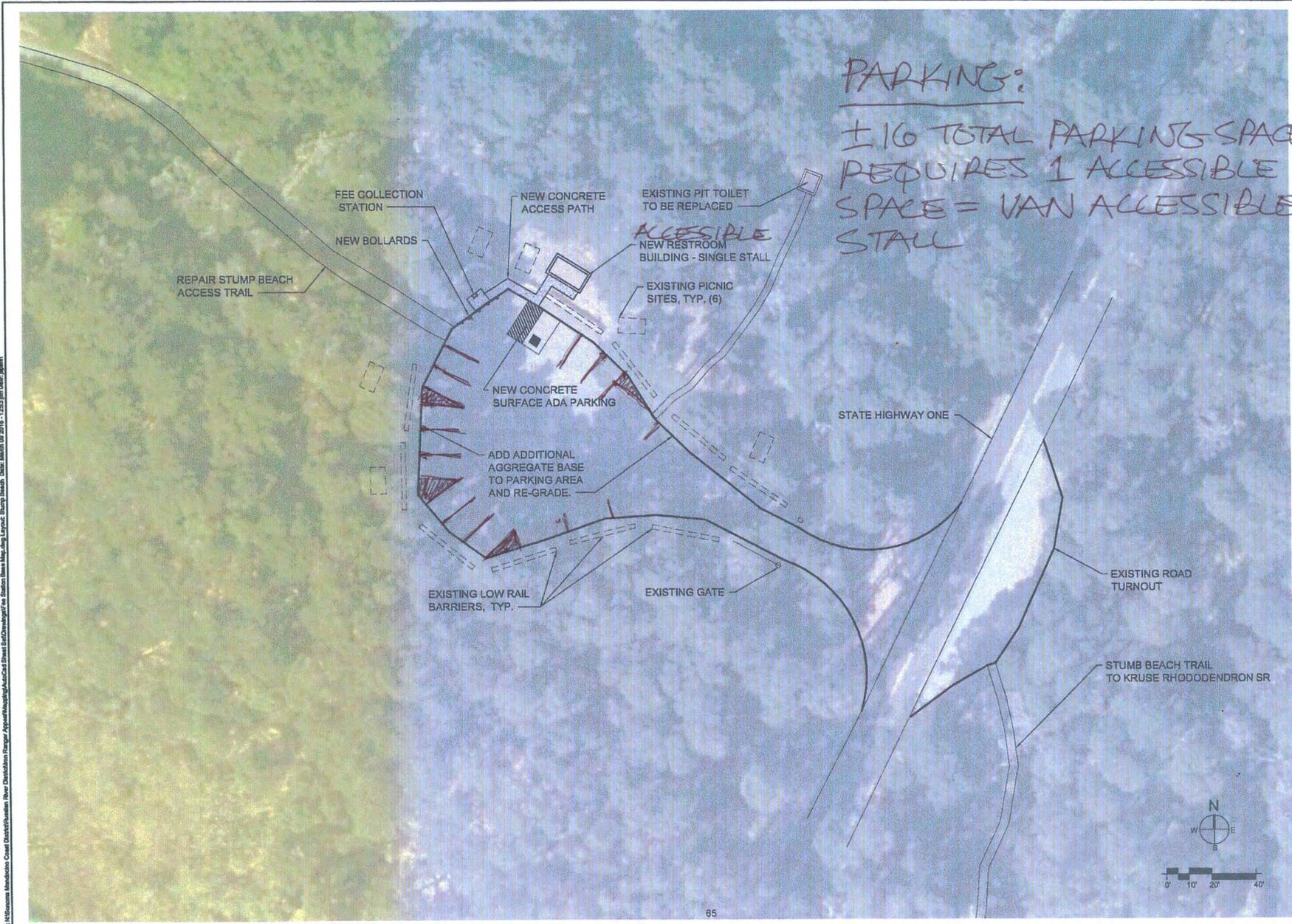
DESIGNED: G. SHANNON  
DRAWN: SHANNON/SPANN  
CHECKED: SHANNON/SPANN  
DATE: 3/1/16

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SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS  
ARCHED ROCK PARKING

DRAWING NO.  
XXXXX.XXX

SHEET NO.  
L-7  
X OF X



File: \\Sonoma\Mapworks\Central\Drawings\Drawings\Other\Drawings\Range\Approvals\gdl\AutoCAD\Draw\Site\Drawings\Site\Station\Draw\Map\Map.dwg Layer: Stump Beach Date: March 02 2016 - 11:25:27 am User: jspann



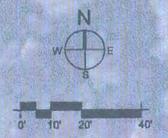
SONOMA-MENDOCINO DISTRICT  
 25381 STEELHEAD BLVD  
 Duncan Mills, CA 95430

CALIFORNIA STATE FIRE MARSHAL - APPROVED  
 Approval of this plan does not authorize or ensure any condition of deviation from applicable regulations. Final approvals subject to field inspection. One set of approved plans shall be available on the project site at all times.  
 Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
 DPI ACCESS COMPLIANCE REVIEW  
 ACCESSIBILITY SECTION  
 CERTIFICATION # \_\_\_\_\_  
 Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
 ACCESSIBILITY COMPLIANCE AND STATE FIRE MARSHAL REVIEW APPROVAL AND SEAL AT THE DEPARTMENT OF PARKS AND RECREATION, NORTHWOOD SERVICE CENTER  
 DESIGNED: G. SHANNON  
 DRAWN: SHANNONSPANN  
 CHECKED: SHANNONSPANN  
 DATE: 3/1/16

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SONOMA COAST STATE PARK  
 FEE COLLECTION STATIONS  
**STUMP BEACH PARKING**

DRAWING NO. XXXXX.XXX  
 SHEET NO. L-8  
 X of X



**From:** [sonomacoastsurfrider@comcast.net](mailto:sonomacoastsurfrider@comcast.net)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Re: Sonoma Coast Surfrider Comments to CCC on SP Fee Proposal  
**Date:** Monday, March 28, 2016 11:25:36 AM  
**Attachments:** [SCSF CCC Comments for 4-13-16.docx](#)  
[Observations on ADA grading.docx](#)  
[State Parks Parking Lot Site Plans.pdf](#)

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Dear Nancy

Please find attached comments from Sonoma Coast Surfrider Foundation recommending denial of DPR's Day Use Parking Fee Collection Devise Proposal. Included in the attachments are comments and diagrams regarding observations on ADA compliance for the proposed areas. I hope this is of help in preparing staff recommendations and finalizing your report.

Sincerely,

Cea Higgins

Policy & Volunteer Coordinator

Sonoma Coast Chapter of Surfrider Foundation



*The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. The Surfrider Foundation now maintains over 90 chapters and 250,000 members, supporters, and activists in the U.S.*

March 22, 2016

Attention: Nancy Cave, District Manager  
North Central Coastal District  
California Coastal Commission  
Re: A-2-SON-13-0219  
California State Parks' Proposed Fee Collection on the Sonoma Coast

The Sonoma Coast Chapter of the Surfrider Foundation recommends denial of the State Park's proposal to implement fees at Bodega Head, Shell Beach, Goat Rock State Beach, & Stump Beach parking area at Salt Point State Beach Park. Surfrider has enjoyed a longstanding cooperative relationship with Department of Parks & Recreation; however our organization's mission to preserve coastal access and resources prevents us from supporting this proposal because the submitted proposal:

- Proposal provides inadequate information of the specifics of the project or any analysis of the impacts and fails to meet both CEQA and Coastal Act requirements,
- Is a violation of public access provisions of the Coastal Act,
- Contains numerous inconsistencies and unsubstantiated data to support DRP's claims, and
- Is the result of a flawed public process

**Inadequate CEQA analysis:** While we recognize that the Coastal Commission's staff report is used as the equivalent to CEQA, the fact that the required information and analysis necessary for complete

disclosure is not available to the commission's staff requires that this project be denied. The 2012 exemption for the original proposal submitted to Sonoma County PRMD which is now being re-utilized by DPR to satisfy CEQA guidelines in this current proposal did not account for the grading or paving necessary to reach ADA compliance, did not account for the change in intensity or density of use that would result from imposition of fees, did not identify natural resources to be managed or protected in the fee areas, and did not identify impacts to natural resources as a result of new fees.

Therefore, if the original CEQA exemption was determined to be inadequate to meet the actual scope of the original proposed project, there is no possibility that it could be adequate for the current proposal which now includes ADA compliance and claims of the necessity of fees to manage resources.

The original Notice of Exemption described the nature and purpose of the project as:

*“...installing 14 self-pay stations and fee signage within Salt Point and Sonoma Coast State Parks. Installation consists of; excavation of holes (maximum 3’ depth X 2’ width), iron rangers set in concrete and sign posts in crushed rock and backfilled with native soil.”*

This description does not include the scope of development involved in grading/paving for ADA compliant parking and pathways or the impacts associated with this level of development which should be analyzed as part of CEQA review. The project description in this revised proposal now includes a provision that includes ADA accessible parking and routes between the accessible parking spaces and fee collection stations. §3.1 of the current proposal under Project Description now acknowledges the physical design features required for *“Construction of the appropriate number of accessible parking spaces commensurate with parking lot capacity”* & *“Construction of ADA compliant concrete paths to connect accessible parking with fee stations.”* §5.3. **ADA Accessibility provides:** *“Each project undertaken by State Parks must be designed and implemented to comply with the Americans with Disabilities Act.”*

However, there is no analysis of the level of grading or paving required and the impacts to coastal resources from the grading. Without such information the impacts to coastal resources cannot be determined. In addition, the current State Park Site plans do not fully meet ADA compliance requirements. DPR currently fails to provide individuals with disabilities adequate access to the Sonoma Coast.



(See attached State Parks Site Plan analysis with noted deficiencies and comments regarding ADA compliance requirements).

Therefore, a complete analysis of the impacts of grading and paving to achieve ADA compliance must be conducted as part of the project’s analysis prior to approval of a permit.

Natural Resources:

The original justifications for an exemption were listed as:

*“project consists of construction and location of limited numbers of new, small facilities, minor public alterations.....and construction or placement of minor structures accessory to (and appurtenant to) existing facilities included as “installation of signs” and “installation of fee collection devices”*

The current proposal in § 1.0 states that *“The proposed project would provide State Parks the ability to more effectively manage vehicular parking during peak use periods on up to 8 existing day use parking areas in Sonoma Coast State Park and Salt Point State Park, as necessary to better accommodate use and prevent deterioration of natural resources”* however there is no analysis of what natural resources are in a given area, where these unidentified resources are located in relation to parking areas, what impacts public use has on those unspecified resources, or how limiting access will protect the unspecified resources.

Therefore, an analysis that comprehensively identifies natural resources to be protected must be conducted as part of any submittal to the Coastal Commission and completed prior to approval of the States Parks proposal. Without such information a determination of the justification under the Coastal Act for imposition of fees based on the necessity to protect natural resources is not possible.

## Public Access & Coastal Act Compliance:

The Sonoma Coast is a “car dependent for access” coastline. There exists no viable public transportation, no urban areas adjacent to coastal access, and no safe means of access by biking or walking. In order to visit the Sonoma Coast beaches, one has to drive and park. Charging for parking is charging to access the coast.

The Coastal Act provides:

•**Section 30210:** Access: In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted and recreational opportunities, shall be provided for all the people...

•**Section 30213:** Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided.

Revenue generation is not legally recognized as a factor in the Coastal Act to limit public access and the imposition of parking fees for the purposes of revenue generation is insufficient justification on its own to limit maximum access opportunities to the coast. DPR claims under §2.5 that newly implemented fees would enhance public access by providing better services and amenities.

As reported in the Commission’s “**Appeal Staff Report; Substantial Issue Determination**” dated April 3, 2015: “...it is not so clearly demonstrated that fees collected under State Parks’ proposed Sonoma Coast project would result in proportionate increases in services that would enhance public access at the very same State Park units on the Sonoma Coast” unless “Parks can demonstrate that there is direct connection between the fees proposed through the denied project and resultant actions/improvements at Sonoma County coastal State Parks units” (page 15)

DPR has failed to show this connection in the current proposal or how they will meet target revenue goals that would result in funds generated from fees actually being utilized in the areas where fees will be implemented. **Public Resource Code 5010.7** requires that funds must be used towards further “fee generating” projects rather than applied to deferred maintenance or enhancing services throughout the Park including those not generating income. In fact, under §2.5 DPR states that “fees collected at state park units are deposited in the State Parks and Recreation fund which is **available upon appropriation by the legislature**”. There is no guarantee that this will occur nor any guarantee, if appropriated, will be spent at the locations generating the income.

Additionally, the current proposal advocates that fees will be used to limit public access as a means to protect coastal resources. In § 4.3 **Consistency with the California Coastal Act**, DPR states that the revised plan will “*maintain maximum public access*”. How can limiting the number of parking spaces and eliminating free ones maintain public access when this stretch of coast can only be reached by the use of private cars? This statement is also inconsistent with the stated goal of the project to reduce impacts on ESHA by reducing over-all public access and use.

**§5.1 ESHA:** Fees will be utilized “as a tool to achieve that balance. If overuse results in resource degradation, the plan calls for implementation of measures including: facility design; installation of barriers; surface treatments; area or facility closure; change in access locations, or redirection of visitors to other areas. Other methods include regulations including limiting the number of people, location or time of use.” DPR fails to explain any of the specifics of the implementation measures or how they would reduce resource degradation rather than expand it by creating new, uncontrolled parking areas. The only method appears to be reduction in usages, which is totally inconsistent with both the Coastal Act and DPR's own statement in § 5.5 where they specifically state that after an initial decrease in attendance the attendance will "rebound". If the primary means to reduce resource degradation is by reducing public use and such use "rebounds" then there will be no benefit to the resources. In fact, by creating new areas which the public will use when their current free parking areas are closed to them, the net impact to coastal resources will be a negative one. DPR's suggestion that those parking along several of the unpaved areas will be subject to payment of fees is without any clue as to how that would be achieved. Therefore, it is difficult to reconcile DPR's conflicting claims that fees enhance public access while at the same time limiting public access.

#### Disproportionate Impact to Youth, Elderly, and Low Income

The current proposal states under § 1.5 **Economic Impact** that “*Household incomes for visitors are relatively high with 57% earning over \$75,000 annually and only 15% earning less than \$40,000.*” However there is no citation that verifies the source of these statistics nor any indication if it includes the household incomes for the visitors from the San Joaquin and Sacramento Valleys which it states under §1.5 make up the majority of users. Sonoma Coast Surfrider also challenges this assertion by DPR as it is inconsistent with our observations as well as data available on demographics of visitors to the coast. According to Measure of America “A Portrait of Sonoma County” (<http://www.measureofamerica.org/sonoma/>), the 2014 median earnings, the main gauge of material living standards in this report, are \$30,214 annually in Sonoma County which is on par with earnings in California which is significantly lower than what DPR reports.

A significant portion of users to the coast are minorities, low income, youth, and the elderly and not the affluent as portrayed in DPR statistics and consist of both a local population as well as inland visitors.

State Parks responds to concerns about disproportionate impacts to these communities with the offer of special passes to offset these impacts. The current special & discounted passes available are inadequate in offsetting the impacts to the groups they purportedly serve.

For example:

1. “GOLDEN POPPY VEHICLE DAY USE ANNUAL PASS – the lowest price pass available costs \$125.00 yet is not valid at the high demand Southern California Beach Parks and admittance and use with the pass is still subject to available space.
2. DISABLED DISCOUNT PASS –costs \$3.50; however, this pass only entitles the bearer to a 50% discount for vehicle day use. Those with physical disabilities will require a path of travel from an ADA compliant parking space to the APM fee collection machine and still need to afford ½ the fee.
3. DISTINGUISHED VETERAN PASS - No Fee (Lifetime Pass) only applies to “honorably discharged” veterans and excludes veterans who are “generally discharged under honorable conditions”.
4. LIMITED USE GOLDEN BEAR PASS –costs \$20.00 for seniors (persons 62 years of age or older) but only works during Non-Peak Season so **can’t be used during summer or holidays.**
5. GOLDEN BEAR PASS – costs \$5.00 for any qualifying person. To qualify a single person must be making less than \$11,328 or \$21,012 for married persons and must submit a tax return and get a sign off from their caseworker if receiving SSI. These rates are less than minimum wage and anyone earning more that this is not eligible for the discounted pass.

According to realistic incomes levels of Sonoma Coast State beach users and visitors there is a significant portion of the population that falls between qualifying for these special passes and those having enough disposable income to pay fees to access the coast. The GOLDEN BEAR PASS does not provide any help for those who need it the most and the application process is difficult and degrading. The annual income level cap means that only those who cannot afford a car might be able to get it. Those who are working at minimum wage and need it the most do not qualify. Even when qualifying, public access is limited by the conditions of the passes themselves and the proposal’s aims to limit access even for pass holders. Also DPR’s website to apply for special passes, even though available in other languages, does not have applications available for the special passes in any other language but English.

### Negative Precedent:

The Commission determined that the justification for finding substantial issue to remove jurisdiction from Sonoma County in April 2015 was because the fee proposal had STATEWIDE implication and that “*these types of statewide issues warrant the Commissions involvement*”. Utilizing this basis for their decision means that the current proposal and result in Sonoma County has the potential to set statewide precedent which will be followed along the entire coast of California. Approval of fees in Sonoma County paves the way to implement fees at unpaved parking areas with minimal amenities through-out the California coastline currently free and providing alternative access to the coast for those that cannot afford to pay for higher developed coastal access lots. The negative and disproportionate impact to public access which the Coastal Act exists to prevent is at issue with this proposal. DPR has already applied for the right to implement fees at undeveloped parking areas in Mendocino County.

### Failure to Comply with the Provisions of the Certified LCP

DPR states in §4.2 that the project is consistent with the Sonoma County LCP however, the County in its analysis made it clear that there are numerous provisions of the LCP that the project does not comply with. In particular, DPR states that the LCP merely states "No change" to the current access available and that this does not include the imposition of fees. However, under the Coastal Act any change in the density or intensity of use is considered development. Therefore the project is considered to be development under the Coastal Act and "no change" means no change in development. Any new development is thus inconsistent with the LCP and requires an amendment to the LCP.

### Inconsistencies and Unsubstantiated Data in Proposal of Concern:

- **§1.4 Visitor Data** states that monitoring of vehicle counts utilizing TRAFx data counters to establish baseline visitation data began in May 2015. Prior to this time DPR has repeatedly stated in public hearings that baseline data did not exist. The proposal; however, includes a chart in **§1.3 Visitation to Sonoma Coast State Park** showing “free day use” statistics for fiscal years beginning 2000/2001 through 2013-2014 without explaining how that data was determined or arrived at. In addition, DPR states that the “method of tracking” does not identify how many vehicles enter versus exit in an hour and only provides the raw data of vehicles triggering a counter.” What they do not acknowledge is how many vehicles are entering and exiting without remaining or actually using the area. The visitation numbers reported are ambiguous and unverified however they are being relied upon to determine revenue goals and justifying reasoning to limit access.

- **§1.4 Visitor Data** states that on certain heavily impacted days at Bodega Head there are more vehicles visiting the Park than parking spaces available. What DPR fails to mention is that they have closed Bodega Head East Lot with 100 parking spaces for over 4 years and therefore channeled all cars to the Bodega West lot. All data gathered for Bodega Head and the impacts of peak use reported are inaccurate as there are no traffic counts for utilization of Bodega Head East Parking lot.
- In **Appendix A "Parking Overview in Sonoma Coast State Park and Salt Point State Park"** DPR indicates 2,414 existing parking stalls. This statistic is being used in **§ 2.1 Existing Conditions** to help support the statement that DPR is challenged to staff and maintain these areas with current revenue generation. We want to point out that 482 "parking stalls" (20%) of the total number are roadside shoulders barely a car width and simply dirt without vegetation. Many of these shoulders are in obscure locations such as "Cemetery" and "Orchard" at Fort Ross State Historic Park and several miles from beach access at the proposed new fee locations. It is a distortion of actual circumstances to imply that they offer viable free parking opportunities for the general populace using Sonoma Coast State Beaches or adding to DPR's hardship of park staffing and maintenance. It should also be noted that DPR recommends installing signage at roadside parking adjunct to fee'd parking lots to inform people there is a fee to park there as well.
- In **Appendix A Parking Overview in Sonoma Coast State Park and Salt Point State Park** DPR depicts a graph which shows that Salt Point lot currently has fees in 82% of developed parking areas, will fee under the proposal an additional 11% when adding the "Stump Beach lot" and leave only 7% of possible access to the coast as free. The inclusion of Stump Beach as a fee location leaving only 7% free access opportunities not only exemplifies DPR's failure to account for public access impacts but also shows that DPR changes the definition of "developed" and "undeveloped" throughout the proposal. DPR classifies Stump Beach lot as "*developed*" although **Appendix F Associated Projects** reveals that the restroom is non-functioning, there is no potable water, and grading/paving would be required for ADA compliance. DPR fails to define the parameters of what constitutes "developed" v. "undeveloped lots" and "amenities provided" is inconsistent and malleable to suit DPR's justifications for implementing fees.
- DPR claims that installation of the fee collection device in certain locations will not induce people to park outside of the day use parking area in areas that have never seen parking, to avoid paying fees because the shoulders on SR 1 in the vicinity have "*dense vegetation, roadside ditches, or other topography that severely limits the ability for creation of shoulder parking.*" Historic practices show otherwise and visitors avoiding fees will continue to seek out dangerous

parking or parking in sensitive habitat to avoid fees resulting in additional resource damage which is not accounted for in any analysis of the net impact of the project.



- **§2.7 “Traffic and Parking Impacts”** DPR recognizes that there *“a few locations where patron may elect to park informally and walk-in rather than pay a day-use fee, creating new parking areas and associated social trails through sensitive habitats”* and cites one of these locations as Shell Beach. Later in the proposal in **§5.1 ESHA** DPR states that at Shell Beach the *“fee collection devices will not induce people to park outside of the day use areas that have never seen parking, to avoid fees”* If DPR is already aware of areas where volunteer trails through sensitive areas exists then rather than utilizing this as a justification that there are “no new” impacts, DPR should be seeking ways to protect these areas rather than increase their usage by adjacent installation of fee collection.
- In **§4.3. CONSISTENCY WITH THE CALIFORNIA COASTAL ACT**, DPR interprets **§30214** to mean that there must be some “limits to free and unrestrained access” and that fees are being implemented in an area where there is “Wholesale free-for-all beach access”. However, **§30210** place only four limitations on the requirement for maximum access and the collection of fees is not one of them. Currently on the Sonoma Coast there is not wholesale free access as DPR charges at Bodega Dunes, Wrights Beach, Reef, Fort Ross, Gerstle Cove, Woodside, and Fisk Mill locations which are staffed parks with camping, programming, and other amenities.
- **Appendix D Response to Comment 5** provides that public access will not be limited because “... fees will only be charged during peak use times.” In other portions of the application DPR does not limit the collection of fees to peak times only. DPR does not explain this anywhere in their application.

Failure to meet Commission’s conditions in other areas where fees have been implemented:

In other areas of California where the Commission has approved fee permits, approval was conditioned upon DPR “*monitoring and periodically reviewing the implementation of any new fee program including impacts on coastal access and annually reporting to the commission available and relevant monitoring data and evaluation including but not limited to daily attendance and impacts to public access.*” To date, DPR has failed to comply with these reporting requirements and no evaluation has been conducted to show if the higher fees had an impact on coastal access or what groups were most affected. **These studies need to be conducted by Parks and evaluated by the Commission before further fees are approved.**

In the current proposal DPR claims in §4.5. **Consistency with the 2013 Agreement between State Parks and CCC** that “*State Parks has incorporated all the measures recommended therein in this proposed project*” and that “*to the extent that the approaches are applicable, they have been incorporated into the Revised Fee Proposal.*” DPR does not list specifically which measures or approaches have been integrated into the revised proposal. In addition if DPR has not met the conditions imposed in other areas, there is little reason to believe that conditions will be complied with under this current permit if approved and impacts to public access and environmental resources will most likely not be measured or reported.

**Public & Stakeholder Process:**

While appreciating State Parks efforts to gather public and stakeholder input, the process was flawed because:

- Many affected groups whose access rights will be disproportionately impacted by new fees, such as Latinos, Native Americans, and low & limited income communities were not included in the stakeholder process even though representatives were available and expressed their interest in being included.
- Throughout the stakeholder process, there was never attendance by state level DPR staff even though their presence was continually requested by the groups involved. This resulted in uncertainty as to which proposal was being evaluated. This caused an unreasonable delay in the planning and notice of the actual goal of the stake holder process which was to design and implement a public forum to gather community input on the proposal.
- In §2.7 **Public Outreach Efforts** DPR claims that at the open house on February 17<sup>th</sup> the “*...meeting quickly became contentious and State Parks was never able to fully articulate its vision*” however what they fail to mention is that State Parks’ staff were refusing to allow public

comment as promised to stakeholders prior to the forum and expected by the attendees-this is what caused the contention.

- The proposed project is continually changing without the ability of the public to have proper notice or the time required to comment fully on it.

For the above reasons, Sonoma Coast Surfrider is recommending denial of DPR's de Novo Application.

Thank you,

*Cea Higgins*

Sonoma Coast Surfrider  
Policy and Volunteer Coordinator

*Spencer Nilson*

Sonoma Coast Surfrider  
Chair

## **Observations on ADA grading/paving requirements for State Parks fee proposal:**

After review of State Parks proposed parking improvements and the associated construction I have the following observations regarding ADA parking and pathway requirements:

1. Unpaved gravel lots at Bodega Head East and Bodega Head West pose a conundrum for determining the correct number of accessible parking spaces based on the total number of parking spaces provided. The best solution is to use State Parks own parking capacity data for each location. When this is done it indicates that more accessible parking needs to be provided at each location.
  - o Bodega Head East: 101 total parking spaces requires 5 accessible spaces including 1 van accessible stall - only 2 accessible spaces are shown on Site Plan Sheet L-1. Estimated grading/paving area for parking spaces, walkways and APPM pad = 1,900 square feet.
  - o Bodega Head West: 92 total parking spaces requires 4 accessible spaces including 1 van accessible stall - only 3 accessible spaces are shown on Site plan Sheet L-2. Estimated grading/paving area for parking spaces, walkways and APPM pad = 1,150 square feet.
2. Shell Beach: 38 total parking spaces requires 2 accessible spaces including 1 van accessible stall. Site Plan Sheet L-3 shows the required 2 accessible spaces. Existing paved parking lot gets restriped. Estimated grading/paving area for walkways and APPM pad = 640 square feet.
3. Blind Beach: 18 total parking spaces requires 1 accessible parking space which would be a van accessible stall. Site Plan Sheet L-4 shows 1 accessible space but does not show a necessary walkway in front of parking space and out of drive area. Also, existing paving condition is not barrier-free so accessible parking zone should be repaved. Existing paved parking lot gets restriped. Estimated grading/paving area for parking spaces, walkways and APPM pad = 640 square feet.
4. Goat Rock South: 112 total parking spaces requires 5 accessible spaces including 1 van accessible stall. Site Plan Sheet L-5 shows 5 accessible spaces. Estimated grading/paving area for walkways and APPM pad = 300 square feet.
5. Goat Rock North: 65 total parking spaces requires 3 accessible spaces including 1 van accessible stall. Site Plan Sheet L-6 shows 3 accessible spaces. Existing paved parking lot gets slightly reconfigured and restriped. Estimated grading/paving area for walkways and APPM pad = 240 square feet.
6. Arched Rock View: 26 total parking spaces requires 2 accessible spaces including 1 van accessible stall. Site Plan Sheet L-7 shows 2 accessible spaces. Existing paved parking lot

gets restriped. Estimated grading/paving area for walkways and APPM pad = 240 square feet.

7. Stump Beach: Existing gravel parking lot is not scheduled for paving. If it were paved and striped it could offer between 16 and 20 total parking spaces which would require 1 accessible parking space including 1 van accessible stall. Site Plan Sheet L-8 shows 1 accessible space. Site Plan Sheet L-8 also shows a new single-occupancy restroom building. Estimated grading/paving area for parking spaces, walkways, restroom building and APPM pad = 750 square feet.

The cumulative grading/paving area for the proposed project is roughly 5,860 square feet. To construct the ADA parking spaces and walkways to the strict tolerances for allowable slopes Civil Engineering Drawings will be necessary. The building permit process should be defined by the Coastal Commission's review of the application in order to have the checks and balances for a Code-complying outcome. California Civil Code Section 55.53 states that a local agency shall employ or retain a building inspector who is a Certified Access Specialist (CASp) to conduct plan permitting and construction inspection for compliance with State construction-related accessibility standards.

*Spencer Nilson,*

Spencer Nilson

AIA (American Institute of Architects), CCS (Certified Construction Specifier)

Sonoma Coast Surfrider Chair







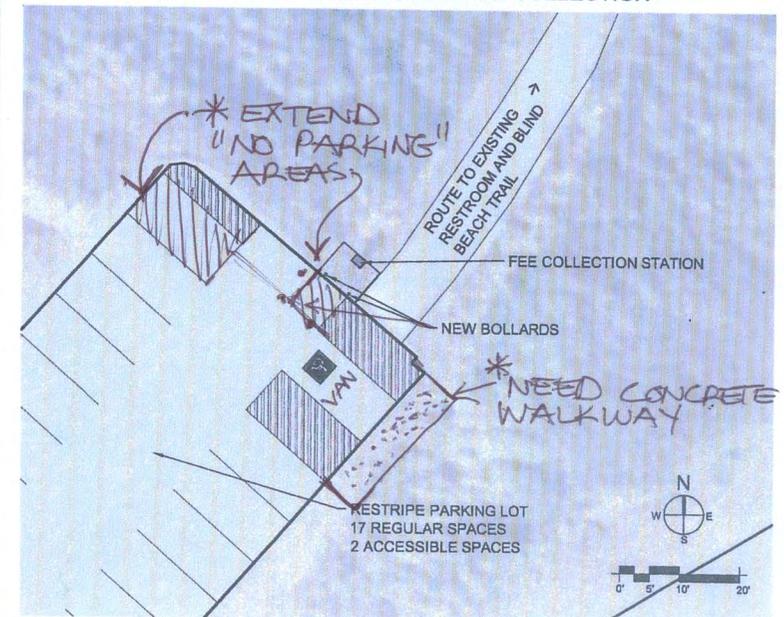


SONOMA-MENDOCINO DISTRICT  
25381 STEELHEAD BL  
Duncan Mills, CA  
95430



PARKING:  
\* NEW CONCRETE & ASPHALT NEEDED FOR BARRIER-FREE PARKING STALLS & WALKWAY.  
18 SPACES TOTAL REQUIRES  
1 ACCESSIBLE PARKING SPACE  
= VAN ACCESSIBLE STALL.

**BLIND BEACH PARKING AND FEE COLLECTION**



CALIFORNIA STATE PARKS  
Approval of this plan does not constitute approval of any other portion of a development project. Final approval is subject to field inspection. One set of approved plans shall be available on project site at all times.  
Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
DPW ACCESS COMPLIANCE PER ACCIDENTALITY SECTION CERTIFICATION # \_\_\_\_\_  
Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
COMPLIANCE WITH THE AMERICAN WITH DISABILITIES ACT AND THE CALIFORNIA STATE AND FEDERAL DISABILITY ACTS. THE DEPARTMENT OF PARKS AND RECREATION SERVICE CENTER  
DESIGNED: G. SHAH  
DRAWN: SHANNONS  
CHECKED: SHANNONS  
DATE: 3/1/18

| REVISIONS |  |
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SONOMA COAST STATE PARK  
FEE COLLECTION STATIONS  
BLIND BEACH PARKING

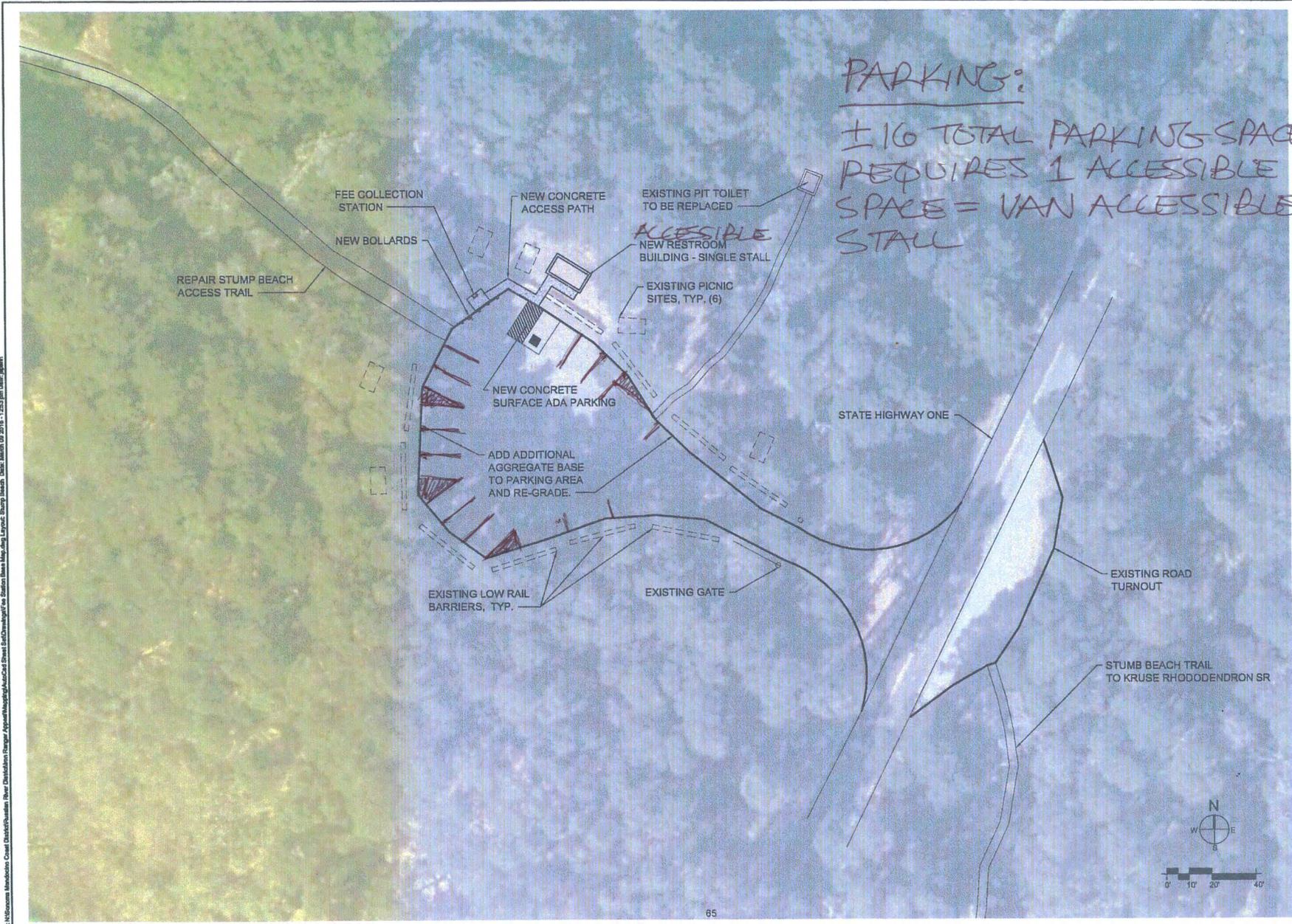
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A-2-SON-13-0219X of 1









File: \\hcsystems\manofac\csm\Drawings\Drawings\Other Drawings\Range\Approvals\gdp\AutoCAD\Draw\StumpBeach.dwg  
 Date: March 02 2016 - 11:25:27 am User: jspann

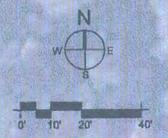


SONOMA-MENDOCINO DISTRICT  
 25381 STEELHEAD BLVD  
 Duncan Mills, CA 95430

**APPROVED:** CALIFORNIA STATE FIRE MARSHAL - APPROVED  
 Approval of this plan does not authorize or ensure any condition of deviation from applicable regulations. Final approvals subject to field inspection. One set of approved plans shall be available on the project site at all times.  
 Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
**APPROVED:** DPI ACCESS COMPLIANCE REVIEW ACCESSIBILITY SECTION CERTIFICATION # \_\_\_\_\_  
 Reviewed by: \_\_\_\_\_ Date: \_\_\_\_\_  
**DESIGNED:** G. SHANNON  
**DRAWN:** SHANNONS/PANN  
**CHECKED:** SHANNONS/PANN  
**DATE:** 3/1/16

| REVISIONS |      |
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SONOMA COAST STATE PARK  
 FEE COLLECTION STATIONS  
**STUMP BEACH PARKING**



DRAWING NO. XXXXX.XXX  
 SHEET NO. L-8  
 X of X

**From:** [sonomacoastsurfrider@comcast.net](mailto:sonomacoastsurfrider@comcast.net)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Re: Sonoma Coast Surfrider Comments to CCC on SP Fee Proposal  
**Date:** Monday, March 28, 2016 11:36:22 AM  
**Attachments:** [SCSF CCC Comments for 4-13-16.docx](#)  
[Observations on ADA grading.docx](#)  
[State Parks Parking Lot Site Plans.pdf](#)

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Dear Nancy

Please find attached comments from Sonoma Coast Surfrider Foundation recommending denial of DPR's Day Use Parking Fee Collection Devise Proposal. Included in the attachments are comments and diagrams regarding observations on ADA compliance for the proposed areas. I hope this is of help in preparing staff recommendations and finalizing your report.

Sincerely,

Cea Higgins

Policy & Volunteer Coordinator

Sonoma Coast Chapter of Surfrider Foundation



*The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. The Surfrider Foundation now maintains over 90 chapters and 250,000 members, supporters, and activists in the U.S.*

March 22, 2016

Attention: Nancy Cave, District Manager  
North Central Coastal District  
California Coastal Commission  
Re: A-2-SON-13-0219  
California State Parks' Proposed Fee Collection on the Sonoma Coast

The Sonoma Coast Chapter of the Surfrider Foundation recommends denial of the State Park's proposal to implement fees at Bodega Head, Shell Beach, Goat Rock State Beach, & Stump Beach parking area at Salt Point State Beach Park. Surfrider has enjoyed a longstanding cooperative relationship with Department of Parks & Recreation; however our organization's mission to preserve coastal access and resources prevents us from supporting this proposal because the submitted proposal:

- Proposal provides inadequate information of the specifics of the project or any analysis of the impacts and fails to meet both CEQA and Coastal Act requirements,
- Is a violation of public access provisions of the Coastal Act,
- Contains numerous inconsistencies and unsubstantiated data to support DRP's claims, and
- Is the result of a flawed public process

**Inadequate CEQA analysis:** While we recognize that the Coastal Commission's staff report is used as the equivalent to CEQA, the fact that the required information and analysis necessary for complete

disclosure is not available to the commission's staff requires that this project be denied. The 2012 exemption for the original proposal submitted to Sonoma County PRMD which is now being re-utilized by DPR to satisfy CEQA guidelines in this current proposal did not account for the grading or paving necessary to reach ADA compliance, did not account for the change in intensity or density of use that would result from imposition of fees, did not identify natural resources to be managed or protected in the fee areas, and did not identify impacts to natural resources as a result of new fees.

Therefore, if the original CEQA exemption was determined to be inadequate to meet the actual scope of the original proposed project, there is no possibility that it could be adequate for the current proposal which now includes ADA compliance and claims of the necessity of fees to manage resources.

The original Notice of Exemption described the nature and purpose of the project as:

*“...installing 14 self-pay stations and fee signage within Salt Point and Sonoma Coast State Parks. Installation consists of; excavation of holes (maximum 3’ depth X 2’ width), iron rangers set in concrete and sign posts in crushed rock and backfilled with native soil.”*

This description does not include the scope of development involved in grading/paving for ADA compliant parking and pathways or the impacts associated with this level of development which should be analyzed as part of CEQA review. The project description in this revised proposal now includes a provision that includes ADA accessible parking and routes between the accessible parking spaces and fee collection stations. §3.1 of the current proposal under Project Description now acknowledges the physical design features required for *“Construction of the appropriate number of accessible parking spaces commensurate with parking lot capacity”* & *“Construction of ADA compliant concrete paths to connect accessible parking with fee stations.”* **§5.3. ADA Accessibility provides:** *“Each project undertaken by State Parks must be designed and implemented to comply with the Americans with Disabilities Act.”*

However, there is no analysis of the level of grading or paving required and the impacts to coastal resources from the grading. Without such information the impacts to coastal resources cannot be determined. In addition, the current State Park Site plans do not fully meet ADA compliance requirements. DPR currently fails to provide individuals with disabilities adequate access to the Sonoma Coast.



(See attached State Parks Site Plan analysis with noted deficiencies and comments regarding ADA compliance requirements).

Therefore, a complete analysis of the impacts of grading and paving to achieve ADA compliance must be conducted as part of the project's analysis prior to approval of a permit.

Natural Resources:

The original justifications for an exemption were listed as:

*“project consists of construction and location of limited numbers of new, small facilities, minor public alterations.....and construction or placement of minor structures accessory to (and appurtenant to) existing facilities included as “installation of signs” and “installation of fee collection devices”*

The current proposal in § 1.0 states that *“The proposed project would provide State Parks the ability to more effectively manage vehicular parking during peak use periods on up to 8 existing day use parking areas in Sonoma Coast State Park and Salt Point State Park, as necessary to better accommodate use and prevent deterioration of natural resources”* however there is no analysis of what natural resources are in a given area, where these unidentified resources are located in relation to parking areas, what impacts public use has on those unspecified resources, or how limiting access will protect the unspecified resources.

Therefore, an analysis that comprehensively identifies natural resources to be protected must be conducted as part of any submittal to the Coastal Commission and completed prior to approval of the States Parks proposal. Without such information a determination of the justification under the Coastal Act for imposition of fees based on the necessity to protect natural resources is not possible.

## **Public Access & Coastal Act Compliance:**

The Sonoma Coast is a “car dependent for access” coastline. There exists no viable public transportation, no urban areas adjacent to coastal access, and no safe means of access by biking or walking. In order to visit the Sonoma Coast beaches, one has to drive and park. Charging for parking is charging to access the coast.

The Coastal Act provides:

•**Section 30210:** Access: In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted and recreational opportunities, shall be provided for all the people...

•**Section 30213:** Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided.

Revenue generation is not legally recognized as a factor in the Coastal Act to limit public access and the imposition of parking fees for the purposes of revenue generation is insufficient justification on its own to limit maximum access opportunities to the coast. DPR claims under §2.5 that newly implemented fees would enhance public access by providing better services and amenities.

As reported in the Commission’s “**Appeal Staff Report; Substantial Issue Determination**” dated April 3, 2015: “...it is not so clearly demonstrated that fees collected under State Parks’ proposed Sonoma Coast project would result in proportionate increases in services that would enhance public access at the very same State Park units on the Sonoma Coast” unless “Parks can demonstrate that there is direct connection between the fees proposed through the denied project and resultant actions/improvements at Sonoma County coastal State Parks units” (page 15)

DPR has failed to show this connection in the current proposal or how they will meet target revenue goals that would result in funds generated from fees actually being utilized in the areas where fees will be implemented. **Public Resource Code 5010.7** requires that funds must be used towards further “fee generating” projects rather than applied to deferred maintenance or enhancing services throughout the Park including those not generating income. In fact, under §2.5 DPR states that “fees collected at state park units are deposition in the State Parks and Recreation fund which is **available upon appropriation by the legislature**”. There is no guarantee that this will occur nor any guarantee, if appropriated, will be spent at the locations generating the income.

Additionally, the current proposal advocates that fees will be used to limit public access as a means to protect coastal resources. In § 4.3 **Consistency with the California Coastal Act**, DPR states that the revised plan will “*maintain maximum public access*”. How can limiting the number of parking spaces and eliminating free ones maintain public access when this stretch of coast can only be reached by the use of private cars? This statement is also inconsistent with the stated goal of the project to reduce impacts on ESHA by reducing over-all public access and use.

**§5.1 ESHA:** Fees will be utilized “as a tool to achieve that balance. If overuse results in resource degradation, the plan calls for implementation of measures including: facility design; installation of barriers; surface treatments; area or facility closure; change in access locations, or redirection of visitors to other areas. Other methods include regulations including limiting the number of people, location or time of use.” DPR fails to explain any of the specifics of the implementation measures or how they would reduce resource degradation rather than expand it by creating new, uncontrolled parking areas. The only method appears to be reduction in usages, which is totally inconsistent with both the Coastal Act and DPR's own statement in § 5.5 where they specifically state that after an initial decrease in attendance the attendance will "rebound". If the primary means to reduce resource degradation is by reducing public use and such use "rebounds" then there will be no benefit to the resources. In fact, by creating new areas which the public will use when their current free parking areas are closed to them, the net impact to coastal resources will be a negative one. DPR's suggestion that those parking along several of the unpaved areas will be subject to payment of fess is without any clue as to how that would be achieved

Therefore, it is difficult to reconcile DPR’s conflicting claims that fees enhance public access while at the same time limiting public access.

#### Disproportionate Impact to Youth, Elderly, and Low Income

The current proposal states under § 1.5 **Economic Impact** that “*Household incomes for visitors are relatively high with 57% earning over \$75,000 annually and only 15% earning less than \$40,000.*” However there is no citation that verifies the source of these statistics nor any indication if it includes the household incomes for the visitors from the San Joaquin and Sacramento Valleys which it states under §1.5 make up the majority of users. Sonoma Coast Surfrider also challenges this assertion by DPR as it is inconsistent with our observations as well as data available on demographics of visitors to the coast. According to Measure of America “A Portrait of Sonoma County” (<http://www.measureofamerica.org/sonoma/>), the 2014 median earnings, the main gauge of material living standards in this report, are \$30,214 annually in Sonoma County which is on par with earnings in California which is significantly lower than what DPR reports.

A significant portion of users to the coast are minorities, low income, youth, and the elderly and not the affluent as portrayed in DPR statistics and consist of both a local population as well as inland visitors.

State Parks responds to concerns about disproportionate impacts to these communities with the offer of special passes to offset these impacts. The current special & discounted passes available are inadequate in offsetting the impacts to the groups they purportedly serve.

For example:

1. “GOLDEN POPPY VEHICLE DAY USE ANNUAL PASS – the lowest price pass available costs \$125.00 yet is not valid at the high demand Southern California Beach Parks and admittance and use with the pass is still subject to available space.
2. DISABLED DISCOUNT PASS –costs \$3.50; however, this pass only entitles the bearer to a 50% discount for vehicle day use. Those with physical disabilities will require a path of travel from an ADA compliant parking space to the APM fee collection machine and still need to afford ½ the fee.
3. DISTINGUISHED VETERAN PASS - No Fee (Lifetime Pass) only applies to “honorably discharged” veterans and excludes veterans who are “generally discharged under honorable conditions”.
4. LIMITED USE GOLDEN BEAR PASS –costs \$20.00 for seniors (persons 62 years of age or older) but only works during Non-Peak Season so **can’t be used during summer or holidays.**
5. GOLDEN BEAR PASS – costs \$5.00 for any qualifying person. To qualify a single person must be making less than \$11,328 or \$21,012 for married persons and must submit a tax return and get a sign off from their caseworker if receiving SSI. These rates are less than minimum wage and anyone earning more that this is not eligible for the discounted pass.

According to realistic incomes levels of Sonoma Coast State beach users and visitors there is a significant portion of the population that falls between qualifying for these special passes and those having enough disposable income to pay fees to access the coast. The GOLDEN BEAR PASS does not provide any help for those who need it the most and the application process is difficult and degrading. The annual income level cap means that only those who cannot afford a car might be able to get it. Those who are working at minimum wage and need it the most do not qualify. Even when qualifying, public access is limited by the conditions of the passes themselves and the proposal’s aims to limit access even for pass holders. Also DPR’s website to apply for special passes, even though available in other languages, does not have applications available for the special passes in any other language but English.

### Negative Precedent:

The Commission determined that the justification for finding substantial issue to remove jurisdiction from Sonoma County in April 2015 was because the fee proposal had STATEWIDE implication and that “*these types of statewide issues warrant the Commissions involvement*”. Utilizing this basis for their decision means that the current proposal and result in Sonoma County has the potential to set statewide precedent which will be followed along the entire coast of California. Approval of fees in Sonoma County paves the way to implement fees at unpaved parking areas with minimal amenities through-out the California coastline currently free and providing alternative access to the coast for those that cannot afford to pay for higher developed coastal access lots. The negative and disproportionate impact to public access which the Coastal Act exists to prevent is at issue with this proposal. DPR has already applied for the right to implement fees at undeveloped parking areas in Mendocino County.

### Failure to Comply with the Provisions of the Certified LCP

DPR states in §4.2 that the project is consistent with the Sonoma County LCP however, the County in its analysis made it clear that there are numerous provisions of the LCP that the project does not comply with. In particular, DPR states that the LCP merely states "No change" to the current access available and that this does not include the imposition of fees. However, under the Coastal Act any change in the density or intensity of use is considered development. Therefore the project is considered to be development under the Coastal Act and "no change" means no change in development. Any new development is thus inconsistent with the LCP and requires an amendment to the LCP.

### Inconsistencies and Unsubstantiated Data in Proposal of Concern:

- **§1.4 Visitor Data** states that monitoring of vehicle counts utilizing TRAFx data counters to establish baseline visitation data began in May 2015. Prior to this time DPR has repeatedly stated in public hearings that baseline data did not exist. The proposal; however, includes a chart in **§1.3 Visitation to Sonoma Coast State Park** showing “free day use” statistics for fiscal years beginning 2000/2001 through 2013-2014 without explaining how that data was determined or arrived at. In addition, DPR states that the “method of tracking” does not identify how many vehicles enter versus exit in an hour and only provides the raw data of vehicles triggering a counter.” What they do not acknowledge is how many vehicles are entering and exiting without remaining or actually using the area. The visitation numbers reported are ambiguous and unverified however they are being relied upon to determine revenue goals and justifying reasoning to limit access.

- **§1.4 Visitor Data** states that on certain heavily impacted days at Bodega Head there are more vehicles visiting the Park than parking spaces available. What DPR fails to mention is that they have closed Bodega Head East Lot with 100 parking spaces for over 4 years and therefore channeled all cars to the Bodega West lot. All data gathered for Bodega Head and the impacts of peak use reported are inaccurate as there are no traffic counts for utilization of Bodega Head East Parking lot.
- In **Appendix A "Parking Overview in Sonoma Coast State Park and Salt Point State Park"** DPR indicates 2,414 existing parking stalls. This statistic is being used in **§ 2.1 Existing Conditions** to help support the statement that DPR is challenged to staff and maintain these areas with current revenue generation. We want to point out that 482 "parking stalls" (20%) of the total number are roadside shoulders barely a car width and simply dirt without vegetation. Many of these shoulders are in obscure locations such as "Cemetery" and "Orchard" at Fort Ross State Historic Park and several miles from beach access at the proposed new fee locations. It is a distortion of actual circumstances to imply that they offer viable free parking opportunities for the general populace using Sonoma Coast State Beaches or adding to DPR's hardship of park staffing and maintenance. It should also be noted that DPR recommends installing signage at roadside parking adjunct to fee'd parking lots to inform people there is a fee to park there as well.
- In **Appendix A Parking Overview in Sonoma Coast State Park and Salt Point State Park** DPR depicts a graph which shows that Salt Point lot currently has fees in 82% of developed parking areas, will fee under the proposal an additional 11% when adding the "Stump Beach lot" and leave only 7% of possible access to the coast as free. The inclusion of Stump Beach as a fee location leaving only 7% free access opportunities not only exemplifies DPR's failure to account for public access impacts but also shows that DPR changes the definition of "developed" and "undeveloped" throughout the proposal. DPR classifies Stump Beach lot as "*developed*" although **Appendix F Associated Projects** reveals that the restroom is non-functioning, there is no potable water, and grading/paving would be required for ADA compliance. DPR fails to define the parameters of what constitutes "developed" v. "undeveloped lots" and "amenities provided" is inconsistent and malleable to suit DPR's justifications for implementing fees.
- DPR claims that installation of the fee collection device in certain locations will not induce people to park outside of the day use parking area in areas that have never seen parking, to avoid paying fees because the shoulders on SR 1 in the vicinity have "*dense vegetation, roadside ditches, or other topography that severely limits the ability for creation of shoulder parking.*" Historic practices show otherwise and visitors avoiding fees will continue to seek out dangerous

parking or parking in sensitive habitat to avoid fees resulting in additional resource damage which is not accounted for in any analysis of the net impact of the project.



- **§2.7 “Traffic and Parking Impacts”** DPR recognizes that there *“a few locations where patron may elect to park informally and walk-in rather than pay a day-use fee, creating new parking areas and associated social trails through sensitive habitats”* and cites one of these locations as Shell Beach. Later in the proposal in **§5.1 ESHA** DPR states that at Shell Beach the *“fee collection devices will not induce people to park outside of the day use areas that have never seen parking, to avoid fees”* If DPR is already aware of areas where volunteer trails through sensitive areas exists then rather than utilizing this as a justification that there are “no new” impacts, DPR should be seeking ways to protect these areas rather than increase their usage by adjacent installation of fee collection.
- In **§4.3. CONSISTENCY WITH THE CALIFORNIA COASTAL ACT**, DPR interprets **§30214** to mean that there must be some “limits to free and unrestrained access” and that fees are being implemented in an area where there is “Wholesale free-for-all beach access”. However, **§30210** place only four limitations on the requirement for maximum access and the collection of fees is not one of them. Currently on the Sonoma Coast there is not wholesale free access as DPR charges at Bodega Dunes, Wrights Beach, Reef, Fort Ross, Gerstle Cove, Woodside, and Fisk Mill locations which are staffed parks with camping, programming, and other amenities.
- **Appendix D Response to Comment 5** provides that public access will not be limited because “... fees will only be charged during peak use times.” In other portions of the application DPR does not limit the collection of fees to peak times only. DPR does not explain this anywhere in their application.

Failure to meet Commission’s conditions in other areas where fees have been implemented:

In other areas of California where the Commission has approved fee permits, approval was conditioned upon DPR “*monitoring and periodically reviewing the implementation of any new fee program including impacts on coastal access and annually reporting to the commission available and relevant monitoring data and evaluation including but not limited to daily attendance and impacts to public access.*” To date, DPR has failed to comply with these reporting requirements and no evaluation has been conducted to show if the higher fees had an impact on coastal access or what groups were most affected. **These studies need to be conducted by Parks and evaluated by the Commission before further fees are approved.**

In the current proposal DPR claims in §4.5. **Consistency with the 2013 Agreement between State Parks and CCC** that “*State Parks has incorporated all the measures recommended therein in this proposed project*” and that “*to the extent that the approaches are applicable, they have been incorporated into the Revised Fee Proposal.*” DPR does not list specifically which measures or approaches have been integrated into the revised proposal. In addition if DPR has not met the conditions imposed in other areas, there is little reason to believe that conditions will be complied with under this current permit if approved and impacts to public access and environmental resources will most likely not be measured or reported.

**Public & Stakeholder Process:**

While appreciating State Parks efforts to gather public and stakeholder input, the process was flawed because:

- Many affected groups whose access rights will be disproportionately impacted by new fees, such as Latinos, Native Americans, and low & limited income communities were not included in the stakeholder process even though representatives were available and expressed their interest in being included.
- Throughout the stakeholder process, there was never attendance by state level DPR staff even though their presence was continually requested by the groups involved. This resulted in uncertainty as to which proposal was being evaluated. This caused an unreasonable delay in the planning and notice of the actual goal of the stake holder process which was to design and implement a public forum to gather community input on the proposal.
- In §2.7 **Public Outreach Efforts** DPR claims that at the open house on February 17<sup>th</sup> the “*...meeting quickly became contentious and State Parks was never able to fully articulate its vision*” however what they fail to mention is that State Parks’ staff were refusing to allow public

comment as promised to stakeholders prior to the forum and expected by the attendees-this is what caused the contention.

- The proposed project is continually changing without the ability of the public to have proper notice or the time required to comment fully on it.

For the above reasons, Sonoma Coast Surfrider is recommending denial of DPR's de Novo Application.

Thank you,

*Cea Higgins*

Sonoma Coast Surfrider  
Policy and Volunteer Coordinator

*Spencer Nilson*

Sonoma Coast Surfrider  
Chair

## **Observations on ADA grading/paving requirements for State Parks fee proposal:**

After review of State Parks proposed parking improvements and the associated construction I have the following observations regarding ADA parking and pathway requirements:

1. Unpaved gravel lots at Bodega Head East and Bodega Head West pose a conundrum for determining the correct number of accessible parking spaces based on the total number of parking spaces provided. The best solution is to use State Parks own parking capacity data for each location. When this is done it indicates that more accessible parking needs to be provided at each location.
  - o Bodega Head East: 101 total parking spaces requires 5 accessible spaces including 1 van accessible stall - only 2 accessible spaces are shown on Site Plan Sheet L-1. Estimated grading/paving area for parking spaces, walkways and APPM pad = 1,900 square feet.
  - o Bodega Head West: 92 total parking spaces requires 4 accessible spaces including 1 van accessible stall - only 3 accessible spaces are shown on Site plan Sheet L-2. Estimated grading/paving area for parking spaces, walkways and APPM pad = 1,150 square feet.
2. Shell Beach: 38 total parking spaces requires 2 accessible spaces including 1 van accessible stall. Site Plan Sheet L-3 shows the required 2 accessible spaces. Existing paved parking lot gets restriped. Estimated grading/paving area for walkways and APPM pad = 640 square feet.
3. Blind Beach: 18 total parking spaces requires 1 accessible parking space which would be a van accessible stall. Site Plan Sheet L-4 shows 1 accessible space but does not show a necessary walkway in front of parking space and out of drive area. Also, existing paving condition is not barrier-free so accessible parking zone should be repaved. Existing paved parking lot gets restriped. Estimated grading/paving area for parking spaces, walkways and APPM pad = 640 square feet.
4. Goat Rock South: 112 total parking spaces requires 5 accessible spaces including 1 van accessible stall. Site Plan Sheet L-5 shows 5 accessible spaces. Estimated grading/paving area for walkways and APPM pad = 300 square feet.
5. Goat Rock North: 65 total parking spaces requires 3 accessible spaces including 1 van accessible stall. Site Plan Sheet L-6 shows 3 accessible spaces. Existing paved parking lot gets slightly reconfigured and restriped. Estimated grading/paving area for walkways and APPM pad = 240 square feet.
6. Arched Rock View: 26 total parking spaces requires 2 accessible spaces including 1 van accessible stall. Site Plan Sheet L-7 shows 2 accessible spaces. Existing paved parking lot

gets restriped. Estimated grading/paving area for walkways and APPM pad = 240 square feet.

7. Stump Beach: Existing gravel parking lot is not scheduled for paving. If it were paved and striped it could offer between 16 and 20 total parking spaces which would require 1 accessible parking space including 1 van accessible stall. Site Plan Sheet L-8 shows 1 accessible space. Site Plan Sheet L-8 also shows a new single-occupancy restroom building. Estimated grading/paving area for parking spaces, walkways, restroom building and APPM pad = 750 square feet.

The cumulative grading/paving area for the proposed project is roughly 5,860 square feet. To construct the ADA parking spaces and walkways to the strict tolerances for allowable slopes Civil Engineering Drawings will be necessary. The building permit process should be defined by the Coastal Commission's review of the application in order to have the checks and balances for a Code-complying outcome. California Civil Code Section 55.53 states that a local agency shall employ or retain a building inspector who is a Certified Access Specialist (CASp) to conduct plan permitting and construction inspection for compliance with State construction-related accessibility standards.

*Spencer Nilson,*

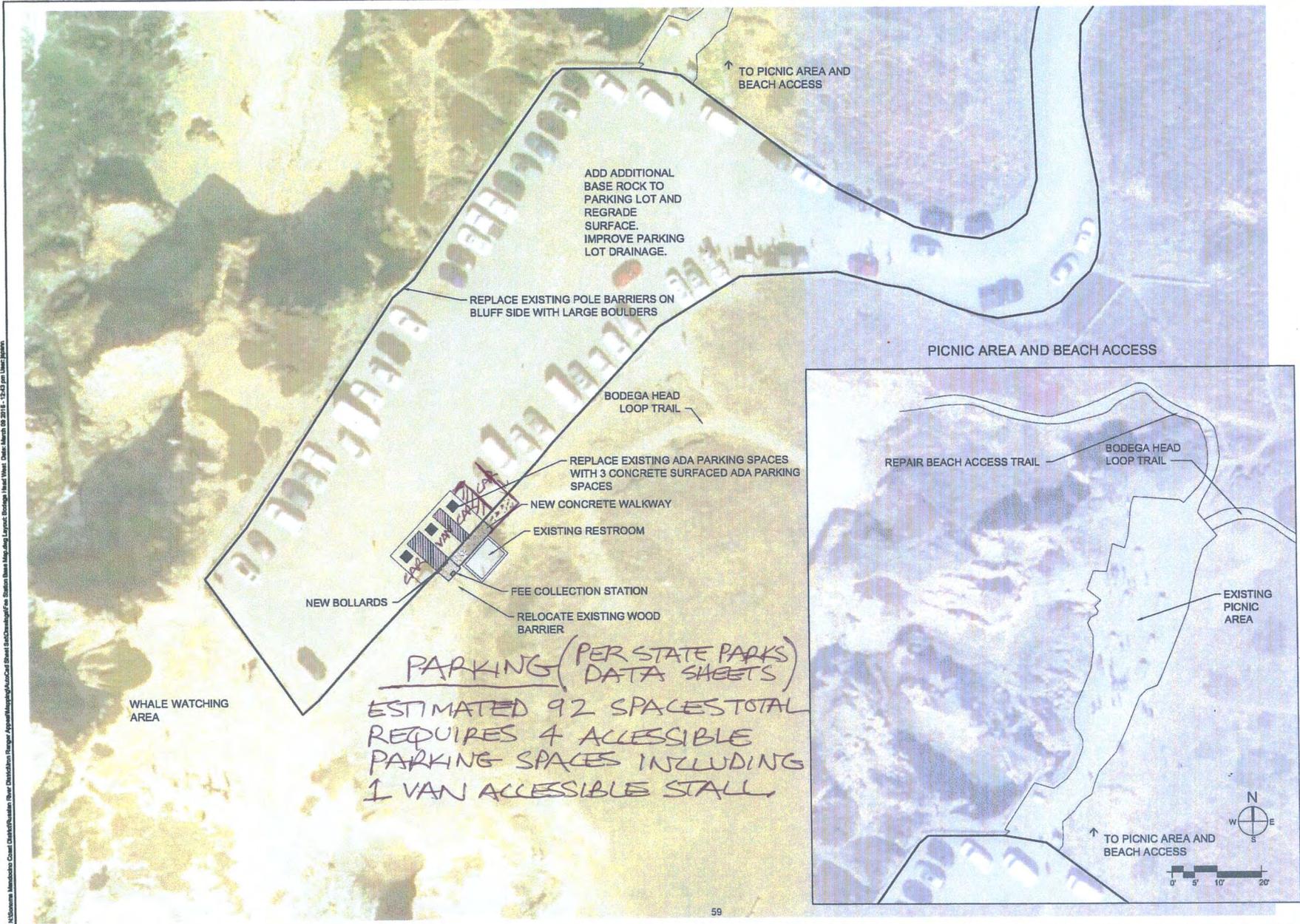
Spencer Nilson

AIA (American Institute of Architects), CCS (Certified Construction Specifier)

Sonoma Coast Surfrider Chair



I:\Sonoma Mendocino Coast\StateParks\New\Drawings\Range\Approved\Range\Coast\BodegaHead\BodegaHead.dwg Layout: Bodega Head West Date: March 09 2016 - 12:42 pm User: jhagan



59



SONOMA-MENDOCINO DISTRICT  
 25361 STEELHEAD BL.  
 DUNCAN MILLS, CA 95430

CALIFORNIA STATE PARKS - APPROVE  
 Approval of this plan does not authorize approval of any construction of deviation from applicable regulations. Final approval is subject to field inspection. One set of approved plans shall be available on the project site at all times.  
 Prepared by: \_\_\_\_\_ Date: \_\_\_\_\_  
 DPR ACCESS COMPLIANCE REVIEW ACCESSIBILITY SECTION CERTIFICATION # \_\_\_\_\_  
 Prepared by: \_\_\_\_\_ Date: \_\_\_\_\_

DESIGNED BY: G. SHANNON  
 DRAWN BY: SHANNON/SPAN  
 CHECKED BY: SHANNON/SPAN  
 DATE: 3/1/16

| REVISIONS |             |
|-----------|-------------|
| No.       | Description |
|           |             |
|           |             |

SONOMA COAST STATE PARK  
 FEE COLLECTION STATIONS  
 BODEGA HEAD PARKING (WEST)

DRAWING NO. XXXXX.XXX  
 SHEET NO. L-2  
 X OF X













**From:** [SCCA](#)  
**To:** [Cave, Nancy@Coastal](#); [SonomaStateParksAppeal@Coastal](#)  
**Cc:** [lorenzo.cordova@asm.ca.gov](#); [jim.wood@asm.ca.gov](#); [ed.sheffield@asm.ca.gov](#); [marc.levine@asm.ca.gov](#); [mike.mcguire@sen.ca.gov](#); [chris.rogers@sen.ca.gov](#); [jerry.brown@gov.ca.gov](#)  
**Subject:** Sonoma County Conservation Action Comments RE: Sonoma Coast Beach Fees  
**Date:** Monday, March 28, 2016 3:16:27 PM  
**Attachments:** [SCCA Commnets Sonoma Coast Beach Fees to CCC 3.26.16.pdf](#)

---

Dear Nancy Cave, Steve Kinsey, and CA Coastal Commissioners,

Please find attached Sonoma County Conservation Action's comments opposing the CA State Parks proposal to place fees on the Sonoma Coast.

Thank you,

Dennis Rosatti  
Executive Director

Sonoma County Conservation Action  
540 Pacific Ave. Santa Rosa, CA 95404  
(707) 571-8566 main office line  
[www.conservationaction.org](http://www.conservationaction.org)



540 Pacific Avenue, Santa Rosa, CA 95404  
scca@ConservationAction.org

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Steve Kinsey, Chair  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

March 26, 2016

Re: Proposed Sonoma County Beach Fees

Dear Chairman Kinsey and Commissioners:

Sonoma County Conservation Action (SCCA) is a 501c (4) organization whose mission is to protect and enhance the resources of Sonoma County. We were founded by former Sonoma County Supervisor Bill Kortum who died last year. Bill played a leading role in the fight for coastal access first in Sonoma County, then throughout the state with the passage of Proposition 20 and the Coastal Act. Bill was instrumental in the acquisition of Salt Point State Park, whose Stump Beach is now being targeted for fees. The Kortum Trail, named in his honor, runs parallel to the oceans in Sonoma Coast State Park. Its north and south trailheads ironically are among the areas proposed for new fees. Sonoma County's policy to stringently enforce coastal access is no accident, it took years of struggle and the commitment of thousands of individuals and great leaders like Bill Kortum.

SCCA strongly supports the principle of "maximum public access," which is embedded in both the California Constitution and the Coastal Act. The County of Sonoma's Local Coastal Plan (LCP) was written with this in mind, and its Local Access and Recreation Plan, relies on no fees for several of the beaches under consideration to meet this goal. It is very disturbing that the Department of Parks and Recreation (DPR) is attempting to sidestep the Coastal Commission approved LCP, and that DPR's rationale is not supported by the Coastal Act. DPR objective is to "increase revenues." Yet DPR's need for revenue generation **is not a legally recognized factor to limit maximum public access**, according to Sections 30210 and 30214 of the Coastal Act. (DPR claims these funds will go to maintain local state beaches and protect resources, but according to the state's revenue generation "rebate" formula, if DPR does not meet its local revenue target, no funds would come back to the local parks, and at best, after taking out funds going directly to DPR, only a small portion of the fees collected would be returned to the local state beaches.)

It should be noted that the project originally denied by Sonoma County is not the project being brought before the Commission for approval. DPR modified the project when it brought it to the Commission for Substantial Issue determination in April 2015, changed it again when it presented it to the public in January 2016 (at a meeting where no public comment was taken), and revised it for a third time in its March 2016 report to the Commission. Fee areas have changed through deletions and additions; they never before discussed shoulder parking at Bodega Head; automated fee devices have replaced rangers and manned fee collection stations; and hourly and demand pricing has been in-



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roduced. How can the Commission consider an appeal of a project that is not the project denied by the County of Sonoma? The proper course would be to either reject this appeal or send this significantly changed project back to the County of Sonoma for a new LCP consistency review.

Price alone will dissuade many individuals and families from accessing our beaches. DPR itself estimates that there would immediately be a 25 percent drop off on use of the new pay lots. Yet DPR claims that there are enough free spaces remaining to meet access requirements – and then they seek to reduce the number of those spaces in their latest project modification which eliminates free shoulder parking at Bodega Head and Goat Rock.

DPR has stated that the purpose of the latest project modification is to address public safety and resources protection concerns, concerns that would be largely nonexistent without the imposition of new parking fees that will encourage visitors to park outside of established lots. DPR does not quantify how many free spaces will be eliminated but it is clear that public access will be further reduced. Charging for or prohibiting parking at the closer-in shoulder sites will also mean those seeking free parking will have to park further away, decreasing access for families and disabled visitors.

Free roadside spaces do not always provide access, especially for the infirm and disabled. For example the walking distance from the entrance to Goat Rock to the beach is 2 miles (a 4 mile round trip). Parking would be Highway 1, along a dangerous curved section. The walk-in would entail navigating several steep slopes. As noted above, DPR has stated its intention to prohibit parking or charge for parking at currently free spaces close to some of the fee collection areas. What this will do is push visitors seeking free parking even further away from access trails resulting in longer, and in some cases more dangerous walks from cars to the parks. And if accidents at Highway 1 pullouts do occur in the future, it is likely that there will be pressure to create new no parking zones, which would further limit access.

The Department argues that its pass program would ensure that that beaches would remain affordable. DPR does have discounted passes, only \$3.50 for disabled, but it only covers half of the parking fee (as an aside there appears to be no plans to use new revenues to improve disabled access to beaches). The limited Golden Bear Pass is \$20 for seniors, but can't be used from Memorial Day to Labor Day or on holidays; the Golden Bear Pass for economically disadvantaged is \$5.00, but eligibility is limited to those earning a fraction of minimum wage. If you are a former P.O.W., a disabled veteran or a Congressional Medal of Honor winner you may be eligible for a free pass, other veterans need not apply. Apparently DPR assumes that the majority of the working poor can afford to lay down \$195.00 for the State Park premium pass or \$125.00 for its passes that do not cover popular southern California beaches (neither pass provides parking for all of the State Parks). The least expensive pass may be DPR's proposed \$50 regional pass, which hopefully will allow parking at the 3 Sonoma County state beaches - at a price several other states charge for their all state park passes - though DPR has yet to specify what it will cover.

Some supporters of the park fees have alluded that Sonoma County, by retaining a historical tradition and protecting its LCP, is not willing to pay its fair share to keep up our parks. The fact is, that Sonoma County residents have made extraordinary generous contribution to our state park system. The Willow Creek unit acquisition was not possible without the Sonoma County Agricultural and Open Space District's contribution of \$10,225,000 (more than half of the purchase price) and The District's funds come from sales taxes col-



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lected in Sonoma County. The District contributed \$350,000 to maintain Willow Creek, while Land Paths, a Sonoma County non-profit, has organized hundreds of volunteers to build trails and protect resources. Stewards of the Coast and Redwoods and the Fort Ross Conservancy have coordinated volunteers and raised funds to keep parks open and maintain and protect parks and offer educational programs at all three state coastal parks.

Other Sonoma County non-profits and hundreds of volunteers have also stepped up in DPR's time of need to keep open the Petaluma Adobe, Jack London State Historical Park and Sugarloaf State Park. And, as DPR has noted in its March report, fees are collected at several state beach sites offering amenities. While Sonoma County residents are asking to keep our beaches free, they are not asking for something for nothing.

Meanwhile DPR is locking up Stump Beach, one of the more isolated beaches on the Sonoma Coast which provides needed recreation space for a small coast and ridge community, to collect **a projected annual revenue of \$3,549**. Given that State Parks has sought and won a Substantial Issue determination from the Commission, this miserly approach, if approved, is likely to be repeated at every isolated gravel lot in the state. Sadly there has been lack of support in Sacramento for restoring greatly reduced General Fund allocations to the State Parks and Recreation Fund (SPRF), while revenue generation and local non-profit support is seen as the panacea for State Parks financial woes. As the Parks Forward Commission recognized, local revenue generation may play a part in bolstering DPR's finances, but to achieve financial stability there needs to be a statewide funding program. Yet after more than a decade of State Park's financial crisis, the administration and the legislature has not undertaken even a study of statewide programs that have served other states well, including low cost universal pass programs, small add-ons to licenses or vehicle registrations, allocations of hotel and gas tax revenues (a portion of gas tax revenues are already allotted to state off road vehicle parks, which are awash with funding) and establishment of resort amenities where appropriate. Instead, the Commission is being asked to interject itself into an approved Local Coastal Plan because of DPR's lack of funding and policy options.

The California Coastal Commission has the responsibility of guaranteeing maximum public access to our coast. It is a terrible affront to the residents of the state who have fought so hard for the right of coastal access when private interests attempt to lock up the coast; it is even more intolerable when the government erects barriers to the public commons, our state beaches and evades the Coastal Act to do so. We urge the Commission to reject DPR's application.

Sincerely,

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

Dennis Rosatti  
Executive Director

cc: CA Coastal Commission Members  
State Senator Mike McGuire  
Assemblyman Marc Levine

Governor Jerry Brown  
Assemblyman Jim Wood

**From:** [Pat Bocca](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Fee proposal for Sonoma County beaches  
**Date:** Monday, March 28, 2016 4:04:32 PM

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Please do everything you can to defeat the proposal to charge a fee for people to go to the beach! We have lived in Sebastopol since 1966 and visit the coast every week.

There have already been laws passed stating that beach access is a "public right"...not based upon affordability. It is the people who live in high density housing who most need and desire the space and unlimited expanse for their children to play and for their enjoyment on days off. It is also the seniors who access the beaches on weekdays...they will be the next most affected if these fees are charged to their limited incomes.

Has anyone who made this decision ever driven up this section of the coast? If the fees are in place, the masses of families who can't afford it will figure a way to go to the other beaches with smaller parking areas...thereby creating an enormous parking situation along the roads and in nearby neighborhoods. Then there will be not only cars, but also groups of people walking on the roads to the beach access points. It's going to be a huge mess. There is no public transportation here!

Please let common sense prevail and vote down these fees and protect our coast.

Thank you,  
Al and Pat Bocca

Sent from my iPad

**From:** [Deb Preston](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Fees at Sonoma County Beaches  
**Date:** Monday, March 28, 2016 8:45:08 PM

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As a resident of west Sonoma County, I oppose all efforts in put in place mandatory fees for coastal access.

Going for a walk on the beach is one of the few free entertainments left. Imposing fees will encourage beach access to be an activity for the elite, not for the average working-class or under-employed person. Yes, I realize that not all beaches will be 'taxed', only the most popular ones. And yes, I realize State Parks is an under-funded entity but I would appreciate some creative thinking instead of going immediately to fee imposition. I have not heard what other options have been considered.

Unrestricted access to the coastline is our birthright as Californians. With the massive development projects on the Southern California coast, more and more of our precious resource is being given away to rock stars and real-estate moguls. Before long there will be little left, and we'll have to pay to visit as if it were a theme park.

Also, there is no doubt that once a fee structure is imposed, it will just keep on going up when times get tough.

Please keep the Sonoma Coast free to all.

Sincerely,  
Deborah E. Preston  
5391 Lone Pine Rd, Sebastopol

**From:** [Sashwa Burrous](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** Please Oppose State Parks Beach Fee Proposal - Letter - SBurrous  
**Date:** Monday, March 28, 2016 10:25:01 PM  
**Attachments:** [PleaseOpposeStateParksProposal\\_SBurrous\\_Letter-2.pdf](#)

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Hi Nancy,  
My letter is attached as a PDF.  
Thank you!  
Sashwa

--

Sashwa Burrous  
[www.sashwa.com](http://www.sashwa.com)



TO:

California Coastal Commission  
45 Fremont Street #2000  
San Francisco, CA 94105

**Re: Please Oppose State Park Beach Fees on the Sonoma Coast**

Dear Commissioners:

Thank you for being open to public comment and hearing the voice of the locals here in Sonoma County. I was born and raised here in west Sonoma County. Growing up in this area I have found that some of my biggest teachers and inspirations have been the woods and the water. Currently living in the wooded hills of Occidental on Coleman Valley road, I find myself roaming the coastline 3-5 times a week, looking for waves and connecting to the ocean that brings me so much joy.

A few months back I was told by a friend that CA State Parks has yet another proposal that aims to reduce access to our coastline by charging vehicles to park along the coast.. A similar proposal to the one which was unanimously voted down by our Supervisors. Seeing that we have very poor public transit in this county, our only way to access the coast is by car. By charging to park, this proposal clearly violates the Local Coastal Plan - which states that the county must take "all necessary steps to protect and defend" the rights of people to access the coast.

The history of the Sonoma Coast shows us that this proposal will not slip through without a fight. Local environmental movements have stopped almost every plan that compromises the integrity of our coastline, starting with Bodega Head nuclear power plant, to recent proposals for sewage plants along our coast. Keep in mind that these are the same movements, which some would say, led to the creation of organizations such as the California Coastal Commission.

Since hearing about this proposal our community has been working together to educate each other on the issues. A group of us created a simple website [www.freeourcoast.com](http://www.freeourcoast.com) which simply shows people how to get involved. Through posters/flyers, short films, social media and conversation we have gathered over 1,500

signatures with hundreds of followers all opposing the plan by the CA State Parks, and this is just start. I feel that I can speak for the community by saying it is not alright to commodify the small portion of our county which is preserved as our commons, our open space, for all of us to share.

I know that this land takes time and money to maintain, we have many solutions which don't involve iron rangers / parking meters along our coast.. One small example of this is Sonoma County Parks offering to manage Bodega Head, one of our favorites sites which is hugely affected by this proposal.

Please support the County of Sonoma's decision by voting NO on this proposal.

Thank you

Sashwa Burrous

**From:** [Dyana Foldvary](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** coastal fees  
**Date:** Tuesday, March 29, 2016 10:22:05 AM

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To whom in charge of this:

I am against charging fees for our state beaches and local parks.  
This puts a hardship of those with low incomes and I feel access  
to our coast is a right all should have.

Although I am against any fees, perhaps you could also consider if such a fee was to be implemented  
to include the regional parks pass as payment for the coastal parking lots.

regards  
Dyana Foldvary  
7381 Hidden Lake Rd  
Forestville, CA 95436  
age 67

**From:** [Peggy Kuhn](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomasStateParksAppeal@Coastal)  
**Subject:** Proposed Fees Sonoma County Coast  
**Date:** Tuesday, March 29, 2016 11:59:53 AM

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RE: PROPERLY IMMUNE FROM VIOLATION

To All Whom It May Concern:

There's something to be said – something that is worth so much more than “the bottom line”.

So much of value has been taken away from our blessed lifestyle living here in Northern California, Sonoma County specifically. (We won't go there). Then to lose the opportunity to freely take in all that the coast has to offer – no matter what is going on in one's life . . . there are no words to express the overall embracing effect - for me and for every single person who has had the opportunity to take the ocean in all it's glory. Do you realize there are some children or senior citizens who have never seen the Pacific Ocean?

Not everyone's pockets are lined with money. But more importantly, how can something so inviolate have a dollar sign fronting it?

I understand the need of expenses. There has to be a way to create funds (donation boxes?) but not as to violate the integrity of the openness of the coast?

Otherwise what is the purpose of the Coastal Commission?

Thank you for your consideration,  
Peggy Kuhn  
5936 Van Keppel Road  
Forestville CA 95436

**From:** [Kaelyn Sophia Ramsden](mailto:Kaelyn.Sophia.Ramsden@sonomastateparks.com)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:Sonomastateparksappeal@coastal.ca.gov)  
**Subject:** Please Keep Our Beaches Open To All  
**Date:** Tuesday, March 29, 2016 12:53:02 PM

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Dear Coastal Commissioners,

Thank you for the work you do as advocates of our California coast line. You are at the front lines of preserving one of the worlds most pristine, most ecologically diverse and adored coast lines, and for all the work that entails I am deeply grateful.

My name is Kaelyn Ramsden and I am a school teacher at Harmony Elementary and Salmon Creek Middle school; both public and charter schools that parallel Salmon Creek and are known for the ways in which we connect classroom curriculum to stewardship activities around our campus and within our local community.

We believe that children learn best if their education is connected to the places, the environments, that they know and love.

After years of bringing classes out to Goat Rock for beach clean ups, trail maintenance and stewardship days the children at our school, from the youngest to the oldest, have developed a strong connection to these locations.

This connection leads a child to beg their family to take them to the beach the next possible weekend. This connection leads a child to pick up trash when they get to the beach because when we love something, we care about its health.

These children do not come from affluence. Many of them would fall into the large number of families and individuals whose access to these unique beaches would be cut off entirely if fees were applied.

With continued free access these children at my school, and so many others in Sonoma County, will grow up having had countless memorable experiences at our beaches that will shape their decisions as leaders and stewards of the future.

The State Parks Proposal cannot be the only solution to an issue that these children's families had no part in creating - in fact, it is these families who contribute tax dollars every year towards keeping our open- spaces protected, maintained and as the term implies OPEN to all.

These locations do not have free parking alternatives beyond the park limits as do exist elsewhere along the California coast. Nor are there public transportation options to the coast to help cut costs for a beach excursion.

Our community does not view this as an unfortunate but necessary step to maintaining our state beaches. Our community sees this as yet another way in which we are being divided.

Within the decision that lies in front of you there is a big opportunity. An opportunity to strengthen community by keeping the coast accessible to ALL people, or to divide community by instating new fees.

I urge you to consider not just your own access but that of the many families that

visit, steward, and create memories each weekend at our Sonoma Coast beaches.

Please stand with the parents, teachers, children, elders, and teens of our community in saying No to the State Parks Proposal.

Thank you for for your time and consideration,

Kaelyn Ramsden

**From:** [Bay Area Climbers Coalition](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** RE: Bay Area Climbers Coalition Comments on the Sonoma Coast State Parks Fee Proposal  
**Date:** Tuesday, March 29, 2016 5:22:52 PM  
**Attachments:** [BACC Comment Letter-CCC and Sonoma Coast.pdf](#)

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**California Coastal Commission**

Attention: Nancy Cave  
45 Fremont Street #2000  
San Francisco, CA 94105

Dear California Coastal Commission,

The Bay Area Climbers Coalition appreciates the opportunity to provide a comment letter regarding the Sonoma Coast and Salt Point State Park Day Use Parking Fee Collection Device Proposal (Fee Proposal).

Please find our Comment Letter attached.

All the Best,  
Matt Ulery  
President - Bay Area Climbers Coalition



March 29, 2016

**California Coastal Commission**

Attention: Nancy Cave  
45 Fremont Street #2000  
San Francisco, CA 94105

Submitted via email: [SonomaStateParksAppeal@Coastal.CA.gov](mailto:SonomaStateParksAppeal@Coastal.CA.gov)

**RE: Bay Area Climbers Coalition Comments on the Sonoma Coast State Parks Fee Proposal**

The Bay Area Climbers Coalition appreciates the opportunity to provide a comment letter regarding the Sonoma Coast and Salt Point State Park Day Use Parking Fee Collection Device Proposal (Fee Proposal). We appreciate that State Parks modified the Fee Proposal to remove the proposed kiosk location at the Goat Rock Beach entrance as this kiosk location would have eliminated the roadside parking areas that are essential for reasonable access for climbers and other user groups to Sunset Rocks. Although this modification to the Fee Proposal directly benefits climbers at Sunset Rocks, we continue to oppose the Fee Proposal.

**The Bay Area Climbers Coalition**

The Bay Area Climbers Coalition is a volunteer run 501(c)(3) non-profit organization focused on preserving access to our local outdoor areas by actively fostering positive relationships with land managers, hosting stewardship events, and providing educational programming for the climbing community. We hosted 13 stewardship focused events last year which engaged 435 volunteers and provided 1,484 hours of volunteer service to support climbing areas throughout the Bay Area. We are also the official "Local Climbing Organization" of the Access Fund for the San Francisco Bay Area - the Access Fund is the largest US climbing organization with over 11,000 members and 100 affiliates.

For more information about the Bay Area Climbers Coalition, please visit:

<http://bayareaclimberscoalition.org/>

**Comments**

The Fee Proposal has been continually evolving making public comments to the California Coastal Commission (CCC) difficult. The latest Fee Proposal was released on March 15, 2016.



The Fee Proposal includes changes to the original Fee Proposal based on public comments. We are pleased access and parking for Sunset Rocks will not be blocked by a fee kiosk. However the current Fee Proposal includes limited and fragmented public scoping, and does not align with Coastal Act Policies. Moreover the implementation of this Fee Proposal would set an inappropriate precedence for user fees for California State Parks.

## Recommendations

The Fee Proposal was developed with limited and fragmented public scoping and does not align with Coastal Act Policies. We recommend additional user groups including the climbing community continue to be involved in the Fee Proposal planning in an organized manner. The introduction of fees to the selected coastal areas is contrary to the California Coastal Commissions mandate to maximize access to the public and will disproportionately affect economically disadvantaged users throughout the Sonoma Coast State Parks. *'The location and amount of new development should maintain and enhance public access to the coast'*.<sup>4</sup> In addition *'Lower cost visitor and recreational facilities and housing opportunities for persons and families of low or moderate income, as defined by Section 50093 of the Health and Safety Code, shall be protected, encouraged, and, where feasible, provided..'*<sup>5</sup>

The State Park's appeal to the California Coastal Commission is viewed by the community as an attempt to take jurisdiction away from the county government who unanimously denied this Fee Proposal's coastal development permit. Allowing this Fee Proposal to go into effect would set an inappropriate precedent for new user fees at State Parks throughout all of California. We recommend that this Fee Proposal not be approved in its current form, adequate time should be given to the public to respond to the latest Fee Proposal, and additional public scoping should be conducted to include input from recreational users and the general public.

<sup>4</sup> Sonoma County Local Coastal Plan, Section VII. Development, Coastal Act Policies 30252

<sup>5</sup> Sonoma County Local Coastal Plan, Section VII. Development, Coastal Act Policies 30213

## Bay Area Climbers Coalition Assistance

The Bay Area Climbers Coalition is ready, able, and willing to provide assistance and leadership with the improvements of trails and other stewardship related projects for Goat Rock Beach. Our organization has proven experience working with land management agencies and the resources to rally the climbing community to provide volunteer support for any size project that could be needed at Goat Rock Beach.



956 62nd Street, Unit 10

Oakland,, CA. 94608

<http://www.bayareaclimberscoalition.org>

[bayareaclimberscoalition@gmail.com](mailto:bayareaclimberscoalition@gmail.com)

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We would also like to thank everyone at the California Coastal Commission for their hard work, passion, and dedication with hearing all of the opinions and viewpoints of the different user groups whom recreate at these amazing outdoor spaces.

Please feel free to reach out to me directly if you wish to discuss how the Bay Area Climbers Coalition can be of help.

Sincerely,

Matt Ulery

President - Bay Area Climbers Coalition

[matthew.ulery@gmail.com](mailto:matthew.ulery@gmail.com)

Mobile - 925.389.8596

**From:** [Kim Atkinson](#)  
**To:** [SonomaStateParksAppeal@Coastal](mailto:SonomaStateParksAppeal@Coastal)  
**Subject:** do not impose parking fees on Sonoma coast  
**Date:** Wednesday, March 30, 2016 3:59:24 PM

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With the economic conditions as they are, low and medium income people like myself need to have access to nature for recreation with out having to pay extra fees.

Your own research shows that people avoid the beaches where they have to pay. All the iron rangers are going to do is exclude the people who need the natural recreation the most.

Please find another way to balance your budget.

Kim

Kim Atkinson  
PO Box 703 Sebastopol CA 95473  
[www.pulsewave.com](http://www.pulsewave.com)

"Those that say something cannot be done should not impede those already doing it"

| Date          | Action                              | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| February 2014 | CCC request for information         | CCC staff requests additional information related to the project and the appeal contentions including: a map of the distribution of existing free and proposed new fee locations, alternative parking or free parking options including roadside pullouts, alternative access routes to the shoreline, statistical evidence to support the claim that minimal impacts to attendance would result from fees, monitoring program to document adverse environmental impacts, and information about Bodega Dunes. |
| February 2014 | DPR submission                      | DPR responds to CCC staff's request for information with a general parking map but none of the other requested information.                                                                                                                                                                                                                                                                                                                                                                                   |
| March 2014    | DPR to CCC Communication            | DPR indicates they would be supplying the additional information requested by the CCC staff in February of 2014.                                                                                                                                                                                                                                                                                                                                                                                              |
| May 2014      | CCC-County Site Visit               | CCC staff tours Sonoma County beaches with County                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| June 2014     | CCC-DPR Site Visit                  | CCC staff tours Sonoma County beaches with DPR                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| October 2014  | DPR to CCC Communication            | DPR contacts CCC staff about proceeding forward on the appeal, requests to hold both SI and De Novo at the Commission hearing in December.                                                                                                                                                                                                                                                                                                                                                                    |
| October 2014  | CCC to DPR Communication            | CCC hearing in December was rescheduled to a non-local hearing. CCC staff indicates to DPR the SI portion of the hearing would be scheduled for April 2014 in Marin County.                                                                                                                                                                                                                                                                                                                                   |
| 3/26/2015     | DPR submission                      | Memo submitted from DPR to CCC staff with additional project information describing important aspects not included in the original proposal including: flexible fee schedule, change from iron rangers to APPMs, and indication that the APPM provided a way to capture data on changes to usage. The information still did not include all of the information requested in February of 2014.                                                                                                                 |
| 4/14/2015     | Commission action                   | Commission hearing in Marin County. Commission found SI on statewide significance and took jurisdiction over the CDP.                                                                                                                                                                                                                                                                                                                                                                                         |
| 4/14/2015     | Commission request for information  | Commission requests additional information before de novo hearing can proceed including: data on existing usage on parking lots and pullout areas, evaluation of expected changes in usage, mitigation measures, the proposed program for use of the additional anticipated revenue, and information regarding facility and amenity improvement for Sonoma County coastal parks.                                                                                                                              |
| 4/14/2015     | Commission request for coordination | Commission requests better engagement with the public. Commission directs DPR to work with CCC staff and the public. Commission directs CCC staff to work with DPR and the County.                                                                                                                                                                                                                                                                                                                            |
| June of 2015  | CCC to DPR Communication            | CCC staff requests that DPR monitor baseline conditions starting immediately at the proposed fee sites and referred them to information requests from the SI hearing.                                                                                                                                                                                                                                                                                                                                         |
| June of 2015  | DPR to CCC Communication            | DPR indicates a preference at this time for a December 2015 hearing and asked for a list of deadlines in order to make that hearing.                                                                                                                                                                                                                                                                                                                                                                          |
| June of 2015  | DPR monitoring                      | DPR began monitoring at a subset of the proposed fee lots only. No monitoring of other parking areas or potential impacts occurred.                                                                                                                                                                                                                                                                                                                                                                           |
| June of 2015  | CCC to DPR Communication            | In approach of December hearing, CCC staff communicates to DPR that they needed data a few months in advance of hearing and invites them to submit on an ongoing basis.                                                                                                                                                                                                                                                                                                                                       |

| Date                    | Action                     | Description                                                                                                                                                                                                                                                                                                   |
|-------------------------|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| June of 2015            | CCC to DPR meeting request | CCC staff attempts to coordinate meetings between CCC staff, DPR and the County to flesh out concerns and how the public participation process would go.                                                                                                                                                      |
| June of 2015            | DPR to CCC communication   | DPR indicates unavailability to meet until late August or September.                                                                                                                                                                                                                                          |
| 7/12/2015               | DPR to CCC communication   | DPR questions the necessity of the interagency meeting with DPR, CCC staff and the County. DPR indicates they would initiate the public meetings.                                                                                                                                                             |
| 7/13/2015               | CCC to DPR communication   | CCC confirms intent of the CCC staff, DPR and County meeting, and asks to be included in the process DPR was moving forward with.                                                                                                                                                                             |
| 7/16/2015               | DPR to CCC communication   | DPR identifies interested stakeholder groups and indicates that they plan to hold meetings.                                                                                                                                                                                                                   |
| 7/20/2015 - 7/22/2015   | CCC to DPR communication   | CCC staff requests a meeting with the County and DPR. DPR does not commit to a date.                                                                                                                                                                                                                          |
| August 2015             | Loss of DPR Staff          | Communication on hold due to the unexpected passing of a DPR staff member                                                                                                                                                                                                                                     |
| Early September 2015    | CCC to DPR communication   | CCC staff reached out to DPR again about holding the meeting between DPR, CCC staff and the County and getting the public outreach underway.                                                                                                                                                                  |
| Late September of 2015  | DPR to CCC communication   | DPR proposes the DPR, CCC staff and County meeting for October and state they had begun the public meetings.                                                                                                                                                                                                  |
| 10/14/2015              | CCC to DPR communication   | Ongoing discussion between CCC and DPR on purpose of the CCC staff, DPR and County meeting; parties unable to resolve specific meeting purpose, so it was canceled; CCC proposes another CCC staff, DPR and County meeting but was told by DPR that they had already been meeting with the County separately. |
| 10/27/2015              | CCC to DPR letter          | At DPR request, CCC staff sent a letter of outstanding informational needs and deadlines to make the April hearing.                                                                                                                                                                                           |
| October - November 2015 | CCC to DPR communication   | DPR and CCC staff again try to schedule a CCC staff, DPR and County meeting. Meeting ultimately scheduled for January 7 <sup>th</sup> .                                                                                                                                                                       |
| October-December 2015   | Stakeholder meetings       | DPR plans stakeholder meetings themselves and CCC attends a majority of meetings.                                                                                                                                                                                                                             |
| 12/1/2015               | CCC to DPR communication   | CCC staff sends email outlining timeline to make April hearing, benchmarks noted include: CCC/County/DPR meeting, public workshops, fieldtrips, and wrap up and production of staff recommendation.                                                                                                           |
| 1/3/2016                | DPR to CCC communication   | DPR cancels January 7 <sup>th</sup> CCC staff-DPR-County meeting. Meeting rescheduled for January 14 <sup>th</sup>                                                                                                                                                                                            |
| 1/13/2016               | CCC-DPR-County meeting     | DPR cancels January 14 <sup>th</sup> CCC staff-DPR-County meeting and expressed unwillingness to meet with the County and CCC at the same time                                                                                                                                                                |
| 2/1/2016                | Stakeholder meetings       | DPR holds additional stakeholder meetings and CCC attends                                                                                                                                                                                                                                                     |
| 2/3/2016                | Stakeholder meetings       | DPR presents draft modified project at stakeholder meeting including: fees at 8 of the original locations, adding 3 new fees at three new sites, and adding 3 kiosks.                                                                                                                                         |

| Date      | Action                                        | Description                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2/17/2016 | DPR hosts public workshop                     | DPR hosts public workshop to present modified project proposal including: flexible fee schedule, low income pass, rerouting fund from free to fee beaches, implementing a Sonoma Coast Advisory Group to maintain public involvement; new project proposes fees at 8 original locations, added 3 new fees at three new sites, 3 kiosks; meeting evidenced limited opportunity for public to voice concerns and DPR did not record public comment. |
| 2/22/2016 | CCC-DPR site visit/meeting                    | DPR and CCC staff tour Sonoma County beaches.                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2/23/2016 | CCC-County site visit/meeting                 | CCC staff and County staff tour Sonoma County beaches.                                                                                                                                                                                                                                                                                                                                                                                            |
| 2/23/2016 | CCC staff hosts public workshop in Santa Rosa | CCC staff hosts public meeting to hear concerns; new issues arising on new proposal from the public.                                                                                                                                                                                                                                                                                                                                              |
| 2/23/2016 | CCC to DPR communication                      | CCC communicates to DPR issues arising that need to be addressed and information needs they still haven't met.                                                                                                                                                                                                                                                                                                                                    |
| 2/29/2016 | CCC-DPR-County meeting                        | CCC staff, County, and DPR meeting occurs; DPR presents current proposal and CCC staff asked for that submittal in writing; potential concerns around CEQA and informational needs raised; discussion of alternatives and potential partnerships to share management of some parks occurred. DPR indicates they still wanted to go to April CCC hearing and decides to modify project to take out new fee areas and kiosks.                       |
| 3/4/2016  | CCC to DPR communication                      | At DPR request, CCC staff sends DPR a list of concerns including requests to address outstanding SI information needs, and reiteration of those concerns expressed on 2/17 and 2/29 (including public participation and CEQA )                                                                                                                                                                                                                    |
| 3/21/2016 | DRP submission                                | DPR submits revised project materials 4 days before the first mailing date for production for the April CCC hearing. The proposal covers a portion of the information needs previously requested by CCC staff.                                                                                                                                                                                                                                    |