

CALIFORNIA COASTAL COMMISSION

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TO: Commissioners and Interested Persons

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**SUBJECT: Improving the LCP Planning Process: Background to the
December 12, 2012 Public Workshop**

I. BACKGROUND

In 2009, the League of Cities Coastal Cities Group, under the direction of the late Jere Melo of the City of Fort Bragg, proposed and helped to sponsor a public workshop between local officials and the Coastal Commission to discuss concerns voiced by local governments about the LCP Amendment process and the need for improved communication with the Commission. Local governments identified some major concerns at that time. These included, for example, perceptions that the Commission takes too long before acting on their items, does not collaborate with the local governments, does not provide enough time for review or negotiation, overreaches and is too detailed in suggesting modifications to LCPs, and ignores the interests of, or the compromises made by, the local decision-makers.

The Commission staff also identified issues related to the LCP process, including: lack of sufficient staff resources for early coordination, inadequate attention by local governments to provision of information and analysis necessary for Commission review of submitted LCP amendments, lack of agreement on the scope and content of a submittal and disagreement on the application and interpretation of Coastal Act policies.

Comments from members of the public included: concerns about deficiencies in local level processes; that the LCP process must involve the broader public, not just the community; that local government goals and Commission goals are often not coterminous; that LCP Amendments are proposed that are not consistent with the Coastal Act; that project driven amendments are often intended to approve a project inconsistent with the LCP; that early collaboration should assure that the public is involved and it must be in an open public manner; that Commission staff should respond to local General Plan updates as a way of encouraging updates to LCPs and to

address sea level rise; that there needs to be more education of local staff and officials on Coastal Act requirements; that local governments should work to increase funding for the Commission; and that the Commission should respect limits to state authority and the powers of local governments.

From that workshop came a number of suggestions that the Commission pursued within its limited resources. This report provides background on the improvements the Commission and staff have made to date to respond to the issues raised in the 2009 workshop, and material to support discussion of key issues and on-going LCP planning challenges in the 2012 Workshop. The League of Cities (LOC) and the California State Association of Counties (CSAC) may also present information on their initiatives and current concerns.

II. BEST PRACTICES/TIPS FOR THE LCP PROCESS

Based on the 2009 workshop discussion of issues with the LCP planning process and on-going coordination with the Commission's Local Government Working Group, Commission staff has focused on improvements that can be made in each of the major steps of the LCP amendment process. Attachment 2 presents a proposed tool that describes what staff believes are "Best Practices" for maximizing effective and efficient collaborative LCP planning for both the Commission and local government. This tool can serve as a guide for discussing ways that the challenges detailed below may be addressed and the process may be enhanced. However, it is important to recognize that these practices convey an "ideal" or set of goals for effective collaborative planning in the coastal zone. Neither the Commission nor local governments currently have sufficient staff resources to fully achieve these best practices in all cases. Nor would implementation of these practices guarantee the resolution of all conflicts between specific LCP amendment proposals and the statewide policies of the Coastal Act. Rather, staff views the Best Practices/Tip sheet as a set of objectives to work towards for all parties. It is offered as a tool to stimulate the Workshop discussion and a shared focus on potential improvements in the planning process. For example, which aspects of the processes, if improved, would achieve the most benefits? How can these practices be advanced given limited resources?

Public Participation

The Best Practices tool focuses specifically on the local and state phases of the LCP amendment process and mechanisms for improving communication between the Commission and local government at each phase. But these practices should also speak to assuring that the public's right and ability to participate in the process continues, and is similarly enhanced. The ideal LCP amendment processes should be transparent and will always provide for full public participation at the local and state level, concerning interests of both local and state concern. Therefore, it is critical that local government and the Commission develop and pursue ways to enhance and expand communication and public participation in the LCP planning process.

III. PROGRESS SINCE THE WORKSHOP OF AUGUST 2009

In its report to the Commission at the hearing of October 7, 2009, following the August 2009 workshop with local government officials, staff suggested improvements in areas of Communication/Coordination, Education/Technology, Streamlining/Efficiencies, Guidance/Local Assistance, and Funding.¹ Commission staff identified several initial, feasible initiatives to pursue. Since 2009, the Commission staff, working more closely with local government staff, has made progress on these initiatives. For example:

- **Meet Regularly with Local Government Working Group (LGWG)**
The Commission and City and County participants began regular Working Group meetings in October 2009. Since then the group has met 10 times, roughly quarterly. In addition, as a result of this coordination, Commission staff participated in several statewide meetings of the coastal groups of the League of Cities (LOC) and the California State Association of Counties (CSAC).
- **Coordinate Local Review of Guidance Documents**
The LGWG established a Technical Advisory Group (TAC) of local planning staff who reviewed and commented on the *Guide for Updating Local Implementation Plans*. That Guidance document is posted on the Commission's website (see <http://www.coastal.ca.gov/la/landx.html>)
- **Review and update online LUP Update Guide**
Under a federal grant, the Commission staff is in the process of completing an update to the LUP Update Guide first published in 2007. This will add information and new examples of LCP policies to address emerging issues.
- **General Communication and Coordination Efforts**
Several ideas were discussed in 2009 to improve communication and coordination, including: conducting joint site visits, increasing participation by Coastal Commission staff at local Board or Council meetings, providing early consultation on amendments—both by local government staff alerting Coastal Commission staff of upcoming items and by coastal staff providing early input to local processes, establishing a Technical Working Group to provide input to development of Commission policy documents, and providing earlier publication of proposed decision documents.

As discussed in more detail below, the Commission staff has implemented some level of improvements in all of these areas. Commission staff is trying to provide more early input and to make any draft suggested modifications available earlier. While more improvements are possible, it will require increased staff resources and funding for both local government and Commission staff.

IV. SUCCESSFUL LCP AMENDMENT COORDINATION –COMMISSION EXAMPLES

¹ See the full report on suggestions from the 2009 workshop presented at the Commission's October 2009 hearing at [Report on Improving the Local Coastal Planning Process](http://documents.coastal.ca.gov/reports/2009/10/W13-10-2009.pdf).
<http://documents.coastal.ca.gov/reports/2009/10/W13-10-2009.pdf>

Since the 2009 workshop, Commission staff has increased coordination with local staff on matters coming before the Commission and often tried to start coordination as early as possible. An inventory of the many cases where the Commission District staff undertook enhanced coordination efforts is detailed in Appendix 1.

V. OTHER INITIATIVES RESPONDING TO 2009 WORKSHOP²

The Commission staff in the last few years has also:

Education/Technology

- Obtained federal grant funds to revise the online Guide for Updating the LUP and to begin the project to build a Digital LCP Library that can ultimately provide online access to LCP documents.

Streamlining/Efficiencies

- Eliminated significant backlog of pending LCP amendments in Santa Cruz County through procedural streamlining and coordination.
- Conducted more pre-application meetings
- Developed a tool for discussion that describes an optimal LCP Amendment process that, given adequate resources, could help improve the processing of LCPAs. (See Appendix A Tips/Best Practices)

Guidance/Local Assistance

- Is developing a Draft Guidance Document that provides additional technical information on sea level rise and LCP guidance.
- Formed a Technical Advisory Committee to provide input to the new Guide for Updating a Local Implementation Plan.

Funding

- Applied for and received federal grant funding for FY 10 to continue the LCP Communication Initiative work.

VI. CHALLENGES IN ACHIEVING SUCCESSFUL COORDINATION

Commission staff has been making efforts to increase early up-front coordination and communication related to LCP amendments, locally issued coastal development permits and post certification matters, and enforcement issues. In general, Commission staff has good working relationships with the local planning staffs. However, there are instances where mutual satisfactory coordination did not occur or was not perceived as successful. These cases yield valuable lessons to guide further improvements:

² For background see [Report on Improving the Local Coastal Planning Process](#).

- Early descriptive notification of proposed amendments is crucial to coordination. In some cases, there was not adequate coordination and communication between the local government staff and Commission staff regarding the scope and content of a planning or permitting item until it was submitted to the Commission or until the local coastal development permit was appealed to the Commission. The Best Practices tool identifies early collaborative problem definition and amendment scoping as an ingredient for later success.
- Timing in the review process is often critical to a successful outcome. Communication of issues by the Commission and coordination with local government, even if extensive, sometimes occurred later in the process after a large investment of public time and resources at the local level. This resulted in cases where local decision-makers were less receptive to changes recommended by the Commission. However, even when early comments are provided, sometimes if either not addressed or not communicated to local decision-makers, it can increase misunderstandings and conflict. The Best Practices tool suggests several ways to identify key points in the process to share information and identify concerns in order to narrow issues.
- It is important to ensure ample time for communication in each step in the LCP amendment process. For example, in some cases, local governments did not have sufficient time to adequately respond to a staff recommendation before it went to Commission hearing, due to the late release of the report. The Best Practices tool identifies practices to communicate as the staff analysis is ongoing and to discuss a proposed schedule that would afford adequate time to communicate and resolve issues.
- Insufficient local or state resources is an impediment. In some cases communication occurred at some points in the local process, but resources were lacking for a more continuous dialog where such concerted involvement would have been beneficial. Also some local staffs had insufficient resources to address Commission adopted suggested modifications or develop a possible resubmittal. To fully implement the suggested Best Practices in all amendments, both the Commission and local government need more staff resources.
- Legal deadlines affect priorities. In some cases early coordination had to give way to allocating staff resources to items with impending legal deadlines. Also, once the deadline to act on a LCP amendment was reached, the Commission had to make a decision and time had run out for more discussions and negotiation. The Best Practices tool suggests that in the initial scoping, timeline and schedule goals could be discussed with the aim to provide for adequate time to address issues raised in the CCC public hearing process.
- On-going Commission decision-making may impact discussions on pending LCP amendments. In some cases the Commission has taken an action on an LCP policy matter that established a new or revised policy direction that affected a pending LCP amendment. However, this presents challenges for other local governments in the midst of a local LCP amendment process. Local deliberations may have concluded or the local

government was not made aware of the new policy direction. Such ongoing Commission actions will occur. The ongoing communication envisioned in the LCP process should provide a way to alert local planners to emerging issues and Commission direction as soon as possible. This may require additional statewide communication.

- Staffing limitations impacts the process in many ways. Besides the obvious constraint of limited staff resources, the loss of senior planners and staffing turnovers raises new issues of continuity and loss of institutional knowledge at both the Commission and local governments. There is a need to incorporate on-going training for both interests.
- Disagreement on fundamental issues can sometimes be expected. Even after extensive communication, the Commission and local decision-makers did not always agree on how to address a particular Coastal Act issue in a particular case.

ATTACHMENT 1

SUCCESSFUL LCP AMENDMENT COORDINATION – COMMISSION EXAMPLES

North Coast

- Held meetings with local staff and before the Council/Board on major LCP Amendments during staff report preparation and on the suggested modifications, including:
 - City of Crescent City LUP Update
 - Humboldt County Samoa Town Plan LCP Amendment
 - Mendocino County Mendocino Town Plan Update
- Arranged for the Coastal Commission itself to hold three workshops and take a field trip to discuss the Georgia Pacific Mill site Reuse Plan for a 400-acre area along the waterfront of Fort Bragg prior to submittal of an LCP amendment.
- Held regular quarterly coordination meetings to discuss upcoming priority planning and permit items with the local staffs of Humboldt County, City of Eureka, Mendocino County, City of Fort Bragg, and the City of Point Arena.
- Provided training for new LCP staff from the City of Point Arena.

North Central Coast

- Held meetings and/or field trips with local staff and before the Council/Board on major LCP Amendments, including the updates of the Marin County LCP, Sonoma County LCP and the City of Daly City LCP.
- Commented extensively on the Marin County LCP update amendment at the draft stage.
- Initiated ongoing coordination meetings with many local governments including Sonoma County and San Mateo County, and hope to expand to other jurisdictions as staffing resources allow.
- Increased efforts to resolve policy questions and achieve major planning updates, including working with San Mateo County staff, Board members, and other stakeholders to resolve policy differences concerning the Midcoast Update.

Central Coast

- Established ongoing regular coordination meetings with many local government staffs, including those of Santa Cruz County, Monterey County, and San Luis Obispo County, the City of Grover Beach, the City of Morro Bay, and the City of Pismo Beach. Commission staff hopes to expand regular coordination to other jurisdictions as staffing resources allow.

- Held LCPA-specific pre-submittal coordination efforts with Sonoma County, Marin County, Santa Cruz County, Monterey County, San Luis Obispo County, and Grover Beach to facilitate communication and improved processes and outcomes.
- Provided certain input to the City of Seaside when it was drafting its new LCP and provided suggested modifications and an opportunity to discuss them ahead of scheduling the matter for a Commission hearing.
- Increased efforts to resolve policy questions and achieve major planning updates, for example:
 - Reached agreement and certified a major update to San Luis Obispo County Estero Area Plan (2009);
 - Held extensive meetings with Monterey County and the Pebble Beach Company following denial of an LCP amendment request to reach agreement on a new amendment that was subsequently approved by the Commission as submitted (no suggested modifications).

South Central

- Established regular monthly coordination meetings with Santa Barbara County Planning staff to discuss and address issues related to LCP amendments, controversial coastal permit applications and enforcement issues. Major LCP amendments include: the Isla Vista Master Plan, Goleta Valley Development Guidelines, revise delineation of ESHA at More Mesa, and the Santa Barbara segment of the Caltrans Highway 101 (HOV) widening project.
- Established regular coordination meetings with UC Santa Barbara staff during the preparation of the comprehensive amendment of the certified Long Range Development Plan (LRDP) for a major campus expansion and update of the LRDP.
- Participated in several regular coordination meetings with the City of Carpinteria and Caltrans staffs on a pending LCPA amendment for Highway 101 HOV lanes and interchange improvements.
- Participated in regular coordination meetings with Ventura County staff and Caltrans staff on the Cal Trans HOV project coastal development permit in northern Ventura County. These coordination meetings resulted in a new parallel Coastal Trail/bikeway seaward of Highway 101, with new or improved shoreline access at seven locations, public access parking area at Punta Gorda, and a new pedestrian undercrossing at La Conchita. Due to these coordination efforts prior to the Board action on this coastal development permit application, the Commission found “No Substantial Issue” on an appeal of this permit in December of 2010.
- Established regular coordination meetings and provided pre-submittal review with Ventura County staff for the first phase of a more comprehensive update to the Zoning

Ordinance portion of the LCP. These meetings were conducted over a one year period and involved intensive collaborative work on the draft LCP amendment. This LCP amendment was approved by the Commission at the November 2012 Commission meeting with just three minor clean-up suggested modifications acceptable to Ventura County.

- Held several coordination meetings with the City of Ventura staff for LCPA for large Mixed Use Project at Ventura Harbor (Sonderman/Ring) which was approved by the Commission in January 2012 with suggested modifications acceptable to the City of Ventura.
- Established monthly pre-submittal review and held regular coordination meetings with Los Angeles County staff for a new LCP segment for the Santa Monica Mountains area of the County.
- Coordinated with Pepperdine University on a major LRDP amendment for a significant campus redevelopment and expansion project.
- Held meetings and coordinated with City of Malibu staff to resolve issues for multiple LCP amendments including the amendment allowing stadium lighting at Malibu High School and changes to the public view corridor provisions of the LCP.

South Coast

- Held regular coordination meetings with Los Angeles County Planning and Beaches and Harbors staff to craft acceptable suggested modification for a major LCP amendment for Marina del Rey which was precipitated by a Periodic LCP Review. This LCP amendment was successfully certified in November, 2011.
- Held monthly coordination meetings with the City of Long Beach. For example, conducted early coordination to achieve successful certification for the Golden Shore LCPA and the Alamitos Bay Marina reconstruction project (CDP 5-10-041).
- Held regular coordination meetings with the Port of Long Beach staff on significant Port amendments. Coordinated on the Gerald Desmond Bridge project to resolve issues.
- Coordinated with the Port of Los Angeles on an upcoming Port Master Plan update.
- Coordinated with the City of Redondo Beach on the Area 2 (ADC) LCP certification for the previously uncertified Harbor area of the City (LCPA 2-08). Met regularly with City staff on CDPs to be issued by the City and CDPs within the Commission's retained jurisdiction in the Harbor area.
- Met or communicated occasionally with City of Rancho Palos Verde staff on local permit matters.

- Provided written support for the Sustainable Communities planning grants (Proposition 84) funding for the City of Long Beach SEADIP LCP update, the City of Hermosa Beach LCP completion, and Los Angeles County Metropolitan Transportation Authority.
- Initiated coordination meetings with the City of San Clemente and the City of Newport Beach toward completion of their LCPs, and hope to establish ongoing coordination meetings with other jurisdictions as staffing resources allow.
- Held meetings and exchanges with the local government staff to work out issues associated with several significant LCP amendments/updates to reach agreement between City and Commission staff by the time the items were presented to the Commission. This occurred for the following significant Orange County items:
 - City of Laguna Beach LCP Land Use Element Update
 - City of Newport Beach LCP Land Use Plan Update/Mixed Use Development
 - City of Huntington Beach Downtown Specific Plan Update.
- Worked with City staff on the Shea-Parkside LCPA to bring the site into the certified LCP, including significant coordination on the content of the IP to assure it adequately implemented the major LUP modifications.
- Coordinated extensively with the City of Dana Point on the Dana Point Harbor Revitalization Plan LCPA.
- Coordinating with the City of Huntington Beach in comprehensively planning for the remaining uncertified areas (The Ridge and Goodell sites) on the Bolsa Chica Mesa.

San Diego Coast

- Held meetings and provided feedback to the City of Chula Vista and the San Diego Port District prior to submittal of the City of Chula Vista LCPA/SD Unified Port District PMPA for the Chula Vista Bayfront Master Plan. After submittal, worked extensively with local City/Port staff to address remaining Coastal Act issues to reach agreement between staffs prior to presentation to the Commission for denial and approval with suggested modifications at the August 2012 meeting.
- Worked cooperatively with City staff towards certification of the City of Solana Beach LCP Land Use Plan. The Commission's March 2012 action of denial and approval with suggested modifications was the result of a number of years of planning and coordination between City and Commission staff to develop an LUP that could achieve certification by the Commission.
- Worked cooperatively and held regular meetings with the City of San Diego staff to conduct detailed review on updated and digitized Post-Certification Maps. This is a time-consuming, labor intensive effort with 43 separate map sheets as the City of San Diego is the largest City in the coastal zone; however, the technology now available will make the

ultimate products more user-friendly and will help streamline the regulatory process for both the public and staff. Target date for Commission action on the maps is March 2013.

- Provided ongoing coordination and allocated a staff position, to working with Caltrans and SANDAG and multiple local governments on development of a Public Works Plan for the I-5 North Coast Corridor, involving widening of I-5, rail corridor double tracking and support facility improvements, habitat restoration and lagoon enhancement, transit opportunities, expansion of bicycle and pedestrian trails, and linkages between transit modes within the northern San Diego County coastal zone. Commission staff has provided input to LCP documents and has met individually with the Cities of Oceanside, Carlsbad, Encinitas, Solana Beach, Del Mar and San Diego, and twice jointly with all City, SANDAG and Caltrans representatives, to assess LCP policy issues and conflicts with the objective to develop LCP provisions that incorporate the changes contemplated by the Public Works Plan over the next 30 years.
- Initiated coordination meetings with the City of San Diego and the City of Carlsbad to identify and address issues related to pending LCP amendments prior to submittal to the Commission and hope to establish ongoing coordination meetings with other jurisdictions as staffing resources allow.

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ATTACHMENT 2

DRAFT TIPS/ BEST PRACTICES FOR PROCESSING LCP AMENDMENTS

These are recommended practices to enhance coordination and decision-making on LCP amendments. This focuses on steps involving local governments and the Commission, and opportunities for increased coordination and enhanced communication. Column one describes the five major LCP amendment phases and their objectives. The second and third columns identify practices that local governments and the Coastal Commission staff could consider at each phase in order to improve communication and public participation, with the ultimate goal of minimizing conflict and facilitating more effective and efficient amendment of LCPs. For more information on statutory and regulatory requirements and Coastal Act issues, check the Commission's website at <http://www.coastal.ca.gov/>

AMENDMENT PHASE	LOCAL STAFF BEST PRACTICES	CCC STAFF BEST PRACTICES
1. INITIAL AMENDMENT SCOPING AND DEVELOPMENT <ul style="list-style-type: none"> ◆ Identify need for an LCP change/problem definition ◆ Identify amendment scope and potential changes to, and effects on, existing LCP ◆ Prepare preliminary draft ◆ GOAL: AGREE ON AMENDMENT SCOPE 	Coordinate Early: <ul style="list-style-type: none"> ◆ Contact CCC staff to discuss need for amendment ◆ Discuss nature and scope of proposed changes ◆ Identify issues raised ◆ Share and discuss early drafts 	Coordinate Early: <ul style="list-style-type: none"> ◆ Meet with local staff ◆ Understand reasons/need for amendment ◆ Discuss issues, information and analytic needs and next steps ◆ Discuss how to characterize and show what the LCP changes will be (especially for complex amendments) ◆ Discuss dividing amendments covering multiple sites or subjects into separate amendments, if processing this way would be more efficient.
2. LOCAL AMENDMENT PROCESS <ul style="list-style-type: none"> ◆ Notify the public of upcoming process and availability of review drafts at least 6 weeks before vote (14 CCR 13515(c)) ◆ Scoping: Notice and conduct local outreach and hearings; notice at least 10 working days before hearing (14 CCR 13515(d)) ◆ Adopt Amendment 	Narrow Issues: <ul style="list-style-type: none"> ◆ Send public copy to CCC staff as soon as available ◆ Meet with CCC staff to discuss process and timeframe necessary to receive comments prior to local action ◆ Continue issue discussion with CCC staff where necessary ◆ Address any CCC staff comments and requested information and analysis ◆ If concerns warrant, share CCC staff input 	Narrow Issues: <ul style="list-style-type: none"> ◆ Conduct initial review of public draft and alert local staff of any major concerns identified ◆ Allocate staff time to review and comment on early drafts prior to local action ◆ Establish timeframes for follow-up discussions with local staff and decision-makers as requested ◆ Attend local hearings as appropriate ◆ Schedule preliminary review before CCC and/or CCC field trips, as appropriate and if feasible

AMENDMENT PHASE	LOCAL STAFF BEST PRACTICES	CCC STAFF BEST PRACTICES
<ul style="list-style-type: none"> ◆ GOAL: REACH AGREEMENT ON LCP AMENDMENT TEXT 	<p>with local decision-makers</p> <ul style="list-style-type: none"> ◆ Notify and provide to CCC staff (and others) any major changes to amendment as it goes through process ◆ Maintain mailing list of interested and participating public ◆ Follow notice requirements of Regulations ◆ Ensure the amendment is clearly described in notices and other distributed materials 	
<p>3. PREPARE SUBMITTAL</p> <ul style="list-style-type: none"> ◆ Assemble LCP materials ◆ Transmit to CCC ◆ Make Available to Public ◆ GOAL: COMPLETE SUBMITTAL 	<p>Avoid Submittal Problems:</p> <ul style="list-style-type: none"> ◆ Discuss contents of submittal package with CCC staff prior to submittal ◆ Satisfy all submittal requirements of Regulations ◆ Provide adequate supporting information ◆ Include in submittal to CCC sufficiently detailed description of changes and their effect on current LCP 	<p>Avoid Submittal Problems:</p> <ul style="list-style-type: none"> ◆ Discuss contents of submittal package with local staff prior to its formal transmittal ◆ Make Submittal Information Available to Public
<p>4. PROCESS AMENDMENT AT CCC</p> <ul style="list-style-type: none"> ◆ Review submittal for completeness <i>within 10 working days unless unusual circumstances (14 CCR 13553)</i> ◆ Address Outstanding Information Needs ◆ File LCP Amendment Submittal ◆ Prepare and release staff report with recommendation <i>at least 7 calendar days before hearing (14 CCR 13554(b) and 13532)</i> ◆ Notice <i>at least 10 days calendar before hearing (14 CCR 13524)</i> ◆ Hold public hearing and vote <i>within 60 days of filing submittal if Implementation only otherwise within 90 days</i> 	<p>Prepare for CCC Action:</p> <ul style="list-style-type: none"> ◆ Respond to CCC filing letter ◆ Discuss CCC staff concerns as they analyze LCPA ◆ Provide any necessary supporting information ◆ Discuss scheduling with CCC staff that affords time to try to resolve issues prior to CCC hearing ◆ Inform CCC if local government does not want suggested modifications ◆ Participate in hearing ◆ Focus comments on any specific points of disagreement with CCC staff 	<p>Prepare for CCC Action:</p> <ul style="list-style-type: none"> ◆ Acknowledge receipt of amendment and discuss filing needs ahead of sending filing letter, if necessary, asking for additional LCPA supporting information ◆ Keep local staff informed of major concerns as LCPA is analyzed and ultimately as staff report is being prepared ◆ Separate into parts after LCP amendment filed as complete, if processing this way would be more efficient ◆ Discuss tentative CCC hearing dates with local staff ◆ Discuss potential to meet with local staff and/or decision-makers to discuss concerns before staff report is released ◆ Consider local staff input into CCC staff report; particularly modification language ◆ Prepare staff recommendation summary of any major points of disagreements and explain any

AMENDMENT PHASE	LOCAL STAFF BEST PRACTICES	CCC STAFF BEST PRACTICES
<p><i>or within up to additional 12 months with time extension (PRC 30512,30513,30517)</i></p> <ul style="list-style-type: none"> ◆ Transmit action to local government ◆ GOAL: CCC ACTION ON AMENDMENT 		<p>suggested modifications</p> <ul style="list-style-type: none"> ◆ After release of staff report be available for continued discussions ◆ Schedule hearing(s) to allow for adequate consideration of recommendation.
<p>5. EFFECTUATE AMENDMENT</p> <ul style="list-style-type: none"> ◆ Local acceptance of any modifications or decide to resubmit <i>within 6 months of CCC action or within additional year with CCC extension (14 CCR 13535(c), 13537(b) and 13542(b))</i> ◆ Finalize local approval ◆ Complete CCC Executive Director check-off ◆ GOAL: AGREE TO AND PUT AMENDMENT INTO EFFECT 	<p>Resolve Differences:</p> <ul style="list-style-type: none"> ◆ Explain to decision-makers reasons for any suggested modifications ◆ If not prepared to accept all modifications as adopted, discuss with CCC staff best options for proceeding ◆ Accurately and thoroughly incorporate final adopted amendment into existing LCP documents; annotate with date and resolution and/or amendment number ◆ Provide Updated LCP Text to CCC (digitally) 	<p>Resolve Differences:</p> <ul style="list-style-type: none"> ◆ Discuss potential to attend Board or Council meeting to discuss Commission action ◆ Continue communication with local staff on response to modifications ◆ Ensure CCC copies of LCP are updated with amendment