

## CALIFORNIA COASTAL COMMISSION

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# W21

## COMMISSIONERS' REPORTS

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Documents included:

1. Report from Commissioner Zimmer
2. Report from Commissioner Vargas

From: Jana Zimmer  
To: Mary Shallenberger  
cc: Mark Vargas, Charles Lester, Hope Schmeltzer  
Subject: Committee on Metrics  
Date: Wednesday, October 02, 2013 6:14:55 PM

Attachments: Draft LCP Action Dashboard.pdf

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To: Chair Shallenberger  
cc: Commissioner Vargas, Director Lester, Hope Schmeltzer  
From: Jana Zimmer  
Re: **Committee on Metrics-Report and Recommendation**

**Summary:** At the September, 2013 meeting Chair Shallenberger appointed an informal committee, consisting of Commissioners Vargas and Zimmer, to work collaboratively with Director Lester over a maximum period of three months to draft “metrics” or “benchmarks” for monitoring the agency’s progress on implementation of the Actions under Goal 4 of the Commission’s Strategic Plan. The members conferred by e mail and telephone in separate conversations with Dr. Lester and with each other, and as a group on September 27.

In addition, Zimmer reviewed the Strategic Plans of several other agencies to investigate the format and content of performance targets for the most analogous land use/regulatory agencies. Among the Strategic Plans reviewed were those of the State Water Board, the Ocean Protection Council, the National Coastal Zone Management Program and several cities and counties, as well as the Coastal Commission’s own 1997 Strategic Plan. These documents reflect a wide range of applications of performance measures/metrics, typically including only a ‘target date’ and performance indicator for adopted actions or objectives.

For our conference call, Dr. Lester provided a draft ‘dashboard’ document, as was discussed in September (copy attached), and also provided the previously distributed document entitled “Preparing for Climate Change through Local Coastal Planning”, which contains specific implementation plans and schedules for both the assistance grants to local governments (p. 2) and implementation steps, to the extent they are within the Commission’s control, for completion and adoption of new and updated local coastal programs.(p. 3). Vargas and Zimmer each commented on the draft dashboard document.

**Work Product:** The draft ‘**dashboard**’ is intended to assist staff, the public and the Commission by providing more specificity for each Action Item under Goal 4 of the Strategic Plan with the addition of:

- **target dates for completion of each action item;**
- **color coded “Status Indicators” for each Action (*Categories: Not Started, In Progress, Complete or Deferred*);**
- **key Outcome Indicator (generally the ‘work product’), e.g. *updated LCP guidance, targeted for 2013-2014, Status: Complete*;**
- **a column with additional descriptive notes and links to background information, and related actions in the Strategic Plan.**

**Conclusion:** The Committee has completed the task set forth by the Chair. However, this committee format has created a significant and counterproductive burden on staff during the time frame most critical to their achievement of the implementation steps of Goal 4, in particular to ‘jump start’ critical LCP work enabled by the 2013-14 Budget Augmentation. Nevertheless, Dr. Lester has indicated his intention to complete the “dashboard” for the remaining Goals, in the same format and level of specificity as was done for Goal 4, and bring it to the Commission in connection with the first annual review of the Strategic Plan in April, 2014. In the interim, he has indicated that he intends to continue to update the Commission in his monthly Executive Director reports specifically on the implementation of the Budget Augmentation as directed by the Commission.

Finally, during this process, sharp differences have emerged between the two Committee members as to the intended scope of the committee’s work. I have reviewed the tape of the September hearing and I conclude that the ‘dashboard’ document we have produced meets the Chair’s express direction, my own intent as the ‘initiator’, and my understanding of the comments of the Commissioners who were present and who made comments. I have also concluded that any extension or expansion of the scope of work of this committee at this time will undermine the agency’s efforts in successful implementation of the LCP work for which the Budget Augmentation was received. Commissioner Vargas intends to seek a broader mandate. I am very concerned that augmentation with the types of additional “Activities” contemplated by Commissioner Vargas is infeasible, and may cross the line into amendments of the Strategic Plan itself, which counsel has advised must be done in a separate, properly noticed public process. I therefore recommend that the Chair receive and file the report and confirm that this Committee has fulfilled its purpose.

Objective/Actions		Schedule			Funding Needed?	Status	Key Outcome Indicator	Background Information and Outcome Links
		2013-14	2014-15	2016-17				
Local Coastal Programs 4.1. Pursue LCP Certification								
4.1.1	Evaluate Uncertified Jurisdictions & ADCs					In progress	Evaluation of Uncertified Areas	Background: <a href="http://www.coastal.ca.gov/lcps.html">http://www.coastal.ca.gov/lcps.html</a>
4.1.2	Conduct Outreach/Feasibility Analysis for LCP Certification					In progress	Feasibility Analysis	See related Grant Program Announcement: <a href="http://www.coastal.ca.gov/lcp/lcpgrantprogram.html">http://www.coastal.ca.gov/lcp/lcpgrantprogram.html</a>
4.1.3	Implement LCP Certification Strategy				Yes -- \$\$\$	In progress	Number of additional LCP segments or ADCs submitted to CCC for certification/certified.	Budget Augmentation for LCP Planning approved for FYI 2013-14; see related action 4.2.4.
Local Coastal Programs 4.2 Update LCPs								
4.2.1	Identify Priority LCP Update Needs					In progress	List of priorities.	Background: <a href="http://www.coastal.ca.gov/lcps.html">http://www.coastal.ca.gov/lcps.html</a>
4.2.2	Evaluate Feasibility of Updates					In progress	Updated Priority List.	See related Grant Program Announcement: <a href="http://www.coastal.ca.gov/lcp/lcpgrantprogram.html">http://www.coastal.ca.gov/lcp/lcpgrantprogram.html</a>
4.2.3	Update Online LCP Guidance	✓				Complete*	Completed Guidance	<b>Updated LUP Guidance Complete:</b> <a href="http://www.coastal.ca.gov/la/lcpNew.html">http://www.coastal.ca.gov/la/lcpNew.html</a> ; * see related Actions 3.1.1, 3.1.2, 2.1.3, 2.1.4, and 2.5.1.
4.2.4	Implement Staff Management Strategies to Support LCP work					In progress	Staffing Strategies for LCP Work Implemented	Budget Augmentation for LCP Planning approved for FYI 2013-14
Local Coastal Programs 4.3. Develop "Digital" LCPs								
4.3.1	Develop Strategy to Provide Digital LCPs					In progress	Completed Needs and Assessment Report	
4.3.2	Implement Pilot Project					Not started	Completed Pilot Project	

4.3.3	Implement Digital LCP Acquisition Strategy				Yes -- \$\$	Deferred	Digital LCPs Available	Current budget provides for no more than 12
4.3.4	Integrate Digital LCPs with Data Management System				Yes -- \$\$	Deferred	Digital LCPs Integrated with CDMS	Current budget provides for no more than 12
<b>Local Coastal Programs 4.4. Improve Local Government Communication</b>								
4.4.1	Conduct Periodic Local Government Workshops				Yes -- \$	Not started	Workshops Held	Background: for recent information see <a href="http://documents.coastal.ca.gov/reports/2013/4/F9b-4-2013.pdf">http://documents.coastal.ca.gov/reports/2013/4/F9b-4-2013.pdf</a>
4.4.2	Convene District-level Coordination Meetings				Yes -- \$\$\$	In progress	Coordination meetings held	Budget Augmentation for LCP Planning approved for FYI 2013-14
4.4.3	Conduct Early Coordination on Major LCP Amds/Updates+A1				Yes -- \$\$\$	In progress	Meetings Held	Budget Augmentation for LCP Planning approved for FYI 2013-14
4.4.4	Provide LCP Amendment Status Information Online				Yes -- \$\$	Deferred	Information Posted	See related Actions 5.2.4, 6.1.6, additional funding needed
4.4.5	Increase LCP Training/coordination for Local Government				Yes -- \$\$\$	Deferred	Trainings Held	Additional Funding required to fully implement
4.4.6	Pursue Joint LCP Funding Strategy with Local Government	✓				Complete / In progress	Implementation of Funding Strategies	LCP Budget Augmentation approved for FY 2013-14
<b>Local Coastal Programs 4.5. Improve LCP Implementation</b>								
4.5.1	Evaluate and Improve Post-certification Monitoring				Yes -- \$\$	Deferred	Completed Recommendation	Additional funding/staffing required to implement
4.5.2	Implement Online Posting of Final Local Action Notices					In progress	FLANs Posted	
4.5.3	Provide Training on Post-certification Monitoring					Not started	Trainings Held	
4.5.4	Evaluate Feasibility of Implementing LCP Periodic Reviews				Yes -- \$\$\$	Deferred	Periodic Reviews	Additional funding/staffing required to implement

From: Mark Vargas  
To: Mary Shallenberger  
cc: Charles Lester; Jana Zimmer  
Subject: Status Update of the Strategic Plan Implementation Committee and Request for Action  
Date: Monday, October 07, 2013 2:13:44 PM

Attachments: Memo to Shallenberger\_Oct 7\_Status Update.pdf

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Chair Shallenberger-

Please see the attached memorandum. I would like to address this memorandum as well as request clarification from the Commission as to the direction of the Committee at this month's Commission meeting.

Thank you,  
mv

To: Mary Shallenberger, Chair  
Cc: Jana Zimmer, Commissioner  
Charles Lester, Executive Director  
From: Mark Vargas, Commissioner  
Date: October 7, 2013  
Attachments: - *LCP Actions Draft*, Prepared by Dr. Charles Lester  
- *Goal 4 Questions for Staff*, Prepared by Mark Vargas  
- Strategic Plan, Goal 4 Excerpts  
Subject: **Status Report for Committee on Strategic Plan Implementation**

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Since its inception, the California Coastal Commission has done an incredible job of protecting our coast, maintaining and improving public access, and balancing individual property rights.

Unfortunately, the Commission's process for administering its responsibilities under the Coastal Act have not kept up with today's standards for transparency and accountability to the public. In general, the public has a right to know:

- What criteria are used to prioritize some action items and defer other action items?
- How the budget process works for the Commission, and how Commissioners and the public can weigh in during the budgeting process,
- When were the current priorities created and when have they or will they come before the Commission for public input and approval?
- What are the criteria for allocating grant funding to third party organizations, and when does such criteria, if ever, come before the Commission?

There is currently a lack of transparency between how some decisions are made at the staff level and whether these decisions were made based upon criteria or priorities set by the Commission itself.

With regard to the Strategic Plan, the public deserves to have a clear expectation of when each action item will be fulfilled. It is clear from the examples in the following pages that there are definable activities that occur within each Action Item whose proper and timely execution are critical to the success or failure of each Action Item. If the Commission relies only on the schedule currently incorporated in the Strategic Plan, it will lack the ability to provide oversight and prescribe corrective measures when entire Action Items are delayed or deferred. Deferring of Strategic Plan Action Items is NOT a decision that the Commission should relegate entirely to staff, as the Strategic Plan represents a commitment that the Commission has made to the public as to how the agency will move forward in the next 5 years.

Section 30333.1 of the California Coastal Act empowers the Commission with the responsibility to review regulations and procedures developed by the agency. Specifically it states:

*The commission shall periodically review its regulations and procedures and determine what revisions, if any, are necessary and appropriate to simplify and expedite the review of any matter that is before the commission for action pursuant to this division. The commission shall implement, within 60 days of the review any such revisions it determines to be appropriate, so that its regulations and procedures may continue to be as simple and expeditious as practicable.*

The Commission not only has a right but an **obligation** to periodically review policies and procedures of the staff. The Commission should consider this section of the Coastal Act, along with the dialogue from the September 12<sup>th</sup>, 2013 meeting related to the formation of the Strategic Plan Implementation Committee, and provide the Committee with further clarification as to what direction it would like to see the Committee take in the future.

### **Action Requested**

The Committee on Strategic Plan Implementation is seeking **further clarity from the Commission as a whole on how to proceed** with its charter for development of benchmarks to monitor the implementation of the strategic plan. While a motion on such clarity is likely not possible since the topic has not been placed on the agenda with sufficient notice, I would like to request that the Chair solicit from the Commission a sense of their feeling on the following Committee guidelines:

1. **Benchmarks** – Does the Commission support the development of benchmarks that explain the sequence of activities related to performing each Action Item?
2. **Timelines** – Does the Commission support the development of more specific timelines that estimate the beginning and end of each sequence of activities related to completion of an Action Item?

In no way is any member of the Committee seeking a “Broader Mandate” for what the Commission desires. There is universal agreement from the Commission that the Committee should not try to add or amend any of the goals or action items of the strategic plan. The purpose of the committee was only to add transparency to the process so that Commissioners and the public would know the on-going progress of the strategic plan and ensure that it remain a living document. It seems clear from the transcripts of last month’s Commission meeting (excerpts below) that Commissioners are seeking ways to develop a road map for how action items are progressing by using both *benchmarks* and *timelines*.

While staff believes that the current layer of information provided to the Committee is sufficient, some on the Committee believe that it is possible and productive to achieve more **transparency** in the execution of some of the Action Items. For example, staff has drafted a table of what it feels is sufficient detail for the following items:



Objective/Actions		Schedule			Funding Needed?	Status	Key Outcome Indicator	Background Information and Outcome Links
		2013-14	2014-15	2016-17				
Local Coastal Programs 4.1. Pursue LCP Certification								
4.1.1	Evaluate Uncertified Jurisdictions & ADCs					In progress	Evaluation of Uncertified Areas	Background: <a href="http://www.coastal.ca.gov/lcps.html">http://www.coastal.ca.gov/lcps.html</a>
4.1.2	Conduct Outreach/Feasibility Analysis for LCP Certification					In progress	Feasibility Analysis	See related Grant Program Announcement: <a href="http://www.coastal.ca.gov/lcp/lcpgrantprogram.html">http://www.coastal.ca.gov/lcp/lcpgrantprogram.html</a>

Commissioner Vargas has developed questions seeking clarity for these items in the following format:

4.1.1	Evaluate uncertified jurisdictions and ADCs; identify priority areas for LCP and ADC certification.	What is the methodology by which staff will determine priority areas (i.e. Geography, Population Density, Amount of Violations or Enforcement Actions)?
		Will priority areas be determined before or after proposals for LCP Grant funding are received from municipalities?
		Will the Commission have an opportunity to review the priority list prior to finalization?
		Approximately what quarter (i.e. Fall 2013?, Winter 2013/2014?, Spring 2014?) is the priority list expected to be completed?
		Does this require additional staffing or financial resources to complete?
4.1.2	Conduct outreach and feasibility analysis for LCP and ADC certification(s) in identified priority areas.	Based on the wording of this action item, is it safe to assume that work on this action item will not begin until completion of Action Item 4.1.1?
		Will this action item be completed before or after proposals for LCP Grant funding are received from municipalities? Before or after grants are given by the Commission?
		What is entailed in "outreach"? Will this consist of written notices & online communication? Will this include physical outreach to municipalities? Will this include outreach events?
		Is the "feasibility analysis" envisioned as distinct from the "outreach" portion of this action item? Please describe what "feasibility analysis" will look like.

It is clear from the language in the above-cited Action Items that there are definable activities that can be developed within each Action Item. With respect to Action Item 4.1.1, there are two obvious activities that are inherent within the title of the Action Item itself; 1) Evaluate uncertified jurisdictions; and 2) identify priority areas for certification. Further review could develop additional activities within those two major categories that address; a) development of methodology for evaluation; drafting by staff & review by Commission; c) finalization/completion.

### **Background on Formation of the Committee**

On September 12, 2013, Chair Shallenberger solicited comments from fellow Commissioners and staff with regard to formation of a committee that would assess:

*“What are the benchmarks that we as the commission, the staff, and the public should be looking at as we move forward over the next year in both spending this money and making the case for a budget augmentation for next year and for fulfilling our strategic plan.”*

Chair Shallenberger stated that her thoughts were that the goal of the committee would be

*“specifically to look at what are the benchmarks going forward on Goal 4 that we should be looking at to know are we on target for getting this done in a timely way.”*

Commissioner Brennan felt the idea of adding benchmarks to the strategic plan action items would facilitate greater transparency and that:

*“It’s taking what we’re doing internally and kind of externalizing it so that in some ways it’s outside the four walls so that we can point to that and its measurable and that we know that it’s a focus and that other people from the outside that we’re going to have to contact to make a case for funding to continue can easily have a finger on the pulse...”*

With regard to this, Commissioner Vargas added:

*“The public deserves to have a clear understanding and an expectation of when those action items are to be fulfilled and what the progress is, and if we wait until the kind of very vague and arbitrary deadlines that are currently in the action plan, say 1 – 3 years, it will be too late to take any corrective measures if we’re falling behind by then.”*

Commissioner Zimmer concurred, saying:

*“There are 163 Action steps listed in the strategic plan that we adopted. Some of them are susceptible to attaching a performance measure, a timing measure, a quantification, I don’t know, I think Commissioner Vargas is much more experienced in that sort of thing than I am. I bring some experience in terms of looking at how we establish those kinds of measures for a planning agency. Nobody’s looking at opening up the plan, changing the goals, changing the policies, none of that. This would be very targeted.”*

Commissioner McClure added:

*"I just want to clarify that, when we talked about doing a matrix or a rubric it was, for me in my head, it was almost like a project management assignment, like if we were, you know, building a new factory, we'd have a spreadsheet that one goal might be ongoing all the way through the activity, but another goal might be to get it done at a certain point... I think we did a good job of the strategic plan. We just want to make sure it stays a living document, and the way to make it a living document is to have a roadmap with it. So for me, that's what that matrix was going to be, is a road map."*

Director Lester responded to these comments by saying:

*"I hear that and so what I'm hearing is that we need more detail on that roadmap. Obviously we as the staff, we had the plan adopted and we're intending to implement it, and now I'm hearing that the Commission itself and the public, perhaps, would just like to understand it in more detail, the progress on those Action Items, and this would be a way to help elucidate the measurement of that progress. And from my perspective, we always intended to do that."*

After hearing all of these comments, Chair Shallenberger decided to

*"Start with appointing a committee of Commissioner Zimmer and Commissioner Vargas, and ask them to work with staff on benchmarks, dashboard, whatever words we want to call it, again making it very clear that it is not anything that would be suggesting amending the strategic plan. It's taking the existing plan and monitoring implementation of it. And I'm going to ask that they start with Goal 4..."*

### **Summary of the Work of the Committee Thus Far**

Almost from the outset, the Committee found itself in disagreement on how to move forward with the charter given to it by the Chair. Commissioner Vargas asked the Executive Director:

*"...to contemplate what Activities need to occur for each Action item, so that we can discuss these draft Activities over a conference call with myself and (Commissioner Zimmer)," adding that "We're just looking for basic concepts that we can refine together."*

Commissioner Zimmer found the request to be of concern, stating that she wanted to be:

*"...extremely mindful of our expressed commitment not to so burden (Director Lester) and staff with prep work that it distracts from the actual work they are doing. And I want to be clear that we are staying within the confines of what the Commission as a whole was in support of."*

Director Lester also had concerns with Commissioner Vargas' requested approach, stating:

*"I interpret the Commission's direction to be working on the identification of a key indicator and/or method to monitor and communicate results of SP*

*implementation. I believe that your suggestions, while certainly valid concepts, speak to methods for project management, not monitoring for results.”*

Director Lester suggested a different approach:

*“I am hopeful that you would be open to a much more targeted approach that provides the general implementation schedule that we have already developed, with additional status, key indicator, and results information. Our intention from the beginning was to report regularly to the Commission along these lines, and certainly at least once a year, but I think we can do this more frequently, and perhaps even monthly, as well as ultimately provide this kind of status dashboard on the entire plan.”*

As they did not want to see the progress of the Committee stalled, Commissioners Vargas and Zimmer agreed to allow Director Lester to proceed with his approach so a draft of his work could be reviewed the following week. Commissioner Vargas cautioned, however, that:

*“In particular, I'd like to see as much detail in the Notes/Products section as possible so we as a commission can begin to understand what it would take to accomplish an action item. And, to be clear, when I ask for detail I'm not necessarily asking for precision but for Charles' conceptual understanding of how a project's tasks will flow (i.e., its okay to use the terms "maybe" or "ideally" or "probably").”*

The Commissioners were, again, in disagreement after reviewing Director Lester's draft work product. While Director Zimmer concluded that the spreadsheet created by Director Lester “did the job” that the Commission was seeking, Commissioner Vargas felt the level of detail in the draft work product was insufficient, lacking any measurable benchmarks beyond what was already vaguely stated in the original strategic plan document. To avoid an impasse, Commissioner Vargas volunteered to develop a draft work product using the reference documents linked within Director Lester's spreadsheet. After thoroughly reviewing Director Lester's spreadsheet and the associated documents referenced in the spreadsheet, Commissioner Vargas concluded that there was insufficient information in the materials to perform such a draft and that:

*“any draft activities I came up with would have little base in facts & figures, which would be rather pointless. Instead, I have written questions to seek clarity for each Action Item.”*

Commissioner Zimmer had the following comments regarding the questions raised in Commissioner Vargas' spreadsheet (attached) :

*“Your questions are directed to establishing ‘Activities’ (and presumably then to set performance indicators for those sub-activities) that would create a level of micromanagement of the daily work of the staff that no commissioner has suggested should be pursued because most of us who have been on the Commission or interacted with the agency for years know is not workable. Charles and I both told you that 90% of the workload is dictated by external factors that staff cannot control, i.e. legal deadlines for permit review and approval, and/or LCP amendment review and approval. In that context, the*

*priorities to a great extent assert themselves, so asking, for example, for which 'quarter' a newly invented subtask might be completed is just not feasible."*

Commissioner Vargas suggested to Commissioner Zimmer that the best path forward at this time would be to ask the Commission for more clarity, "unless you have any productive solutions for moving forward besides going back to the Commission." Commissioner Zimmer has remained steadfast that the Committee's work should come to a "principled conclusion."

## LCP ACTIONS DRAFT – Prepared By Dr. Charles Lester

4.3.3	Implement Digital LCP Acquisition Strategy				Yes -- \$\$	Deferred	Digital LCPs Available	Current federal grant budget supports approximately 12
4.3.4	Integrate Digital LCPs with Data Management System				Yes -- \$\$	Deferred	Digital LCPs Integrated with CDMS	Current federal grant budget supports approximately 12
<b>Local Coastal Programs 4.4. Improve Local Government Communication</b>								
4.4.1	Conduct Periodic Local Government Workshops				Yes -- \$	Not started	Workshops Held	Background: for recent information see <a href="http://documents.coastal.ca.gov/reports/2013/4/F9b-4-2013.pdf">http://documents.coastal.ca.gov/reports/2013/4/F9b-4-2013.pdf</a>
4.4.2	Convene District-level Coordination Meetings				Yes -- \$\$\$	In progress	Coordination meetings held	Budget Augmentation for LCP Planning approved for FYI 2013-14
4.4.3	Conduct Early Coordination on Major LCP Amds/Updates				Yes -- \$\$\$	In progress	Meetings Held	Budget Augmentation for LCP Planning approved for FYI 2013-14
4.4.4	Provide LCP Amendment Status Information Online				Yes -- \$\$	Deferred	Information Posted	See related Actions 5.2.4, 6.1.6, additional funding needed
4.4.5	Increase LCP Training/coordination for Local Government				Yes -- \$\$\$	Deferred	Trainings Held	Additional Funding required to fully implement
4.4.6	Pursue Joint LCP Funding Strategy with Local Government	✓				Complete / In progress	Implementation of Funding Strategies	LCP Budget Augmentation approved for FY 2013-14
<b>Local Coastal Programs 4.5. Improve LCP Implementation</b>								
4.5.1	Evaluate and Improve Post-certification Monitoring				Yes -- \$\$	Deferred	Completed Recommendation	Additional funding/staffing required to implement
4.5.2	Implement Online Posting of Final Local Action Notices					In progress	FLANs Posted	
4.5.3	Provide Training on Post-certification Monitoring					Not started	Trainings Held	

LCP ACTIONS DRAFT – Prepared By Dr. Charles Lester

4.5.4	Evaluate Feasibility of Implementing LCP Periodic Reviews				Yes -- \$\$\$	Deferred	Periodic Reviews	Additional Funding required to implement
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DRAFT

# GOAL 4 QUESTIONS FOR STAFF - Prepared by Commissioner Mark Vargas

GOAL	OBJECTIVE	ACTION	VARGAS QUESTIONS	STAFF RESPONSES
4.0 Strengthen the LCP Planning Program				
4.1 Strengthen the LCP Planning Program				
	4.1.1	Evaluate uncertified jurisdictions and ADCs; identify priority areas for LCP and ADC certification.	What is the methodology by which staff will determine priority areas (i.e. Geography, Population Density, Amount of Violations or Enforcement Actions)?	
			Will priority areas be determined before or after proposals for LCP Grant funding are received from municipalities?	
			Will the Commission have an opportunity to review the priority list prior to finalization?	
			Approximately what quarter (i.e. Fall 2013?, Winter 2013/2014?, Spring 2014?) is the priority list expected to be completed?	
			Does this require additional staffing or financial resources to complete?	
	4.1.2	Conduct outreach and feasibility analysis for LCP and ADC certification(s) in identified priority areas.	Based on the wording of this action item, is it safe to assume that work on this action item will not begin until completion of Action Item 4.1.1?	
			Will this action item be completed before or after proposals for LCP Grant funding are received from municipalities? Before or after grants are given by the Commission?	
			What is entailed in "outreach"? Will this consist of written notices & online communication? Will this include physical outreach to municipalities? Will this include outreach events?	
			Is the "feasibility analysis" envisioned as distinct from the "outreach" portion of this action item? Please describe what "feasibility analysis" will look like.	
	4.1.3	Where local jurisdictions are willing, work together to identify funding and workload management strategies to support development and certification of LCPs and ADCs.	Will this action item begin after grants are provided?	
			When will the "funding strategies" portion of this action item <i>begin</i> , and by when do we expect to see completion of the first funding strategies for LCPs?	
			When can the Commission expect to see "workload management strategies" developed for appropriation of Commission resources?	
			While this action item currently has a 5 year timeline associated with it, there is reference in some documents of LCP certification taking from 5-10 years. Which is a more appropriate time horizon for a "majority of willing local governments and the Commission to comprehensively update and certify local coastal programs and to complete LCPs for areas that have not yet completed their LCPs?"	
			While a majority of LCPs are expected to be certified within 5-10 years, do we have percentage completion goals between now and 10 years from now (i.e. 20% by 2015, 40% by 2016, 50% by 2017, etc.)?	
4.2 Update LCP's				



	4.2.1	Identify LCPs most in need of a comprehensive update, and prioritize these LCPs by ongoing or potential impacts to coastal resources. Consider alternatives to full periodic reviews to identify issues that need addressing in certified LCPs.	Prioritization will occur based on "ongoing potential impacts to coastal resources." What might some of these potential impacts be and what will these impacts take the shape of (i.e. most outdated regulations/policies, outdated regulations, areas with most sensitive habitat, areas with the most violations, etc.)?	
			Have alternatives to full periodic reviews been considered yet? By when can we expect consideration to begin/end? What will the workproduct of such consideration look like?	
			Aproximately what quarter (i.e. Fall 2013?, Winter 2013/2014?, Spring 2014?) is the priority list expected to be completed?	
			Aproximately what quarter (i.e. Fall 2013?, Winter 2013/2014?, Spring 2014?) is the priority list expected to be completed?	
	4.2.2	For priority LCPS, work with local governments to evaluate feasibility of updates.	Based on the wording of this action item, is it safe to assume that work on this action item will not begin until completion of Action Item 4.2.1?	
	4.2.3	Provide and update online guidance to local governments for updating LCPs to improve the transmittal of key planning and policy information related to: (a) Climate change impacts, adaptation, and mitigation; (b) Shoreline protective options and mitigation strategies; (c) Evaluation of ESHA; (d) Wetland delineations; and (e) Protection of agricultural lands.	Just a note - the website shows that the guidance is revised as of July 2013, but the Water Quality Protection section of the guidance says that it is still under construction. <a href="http://www.coastal.ca.gov/la/lcpNew.html">http://www.coastal.ca.gov/la/lcpNew.html</a>	
	4.2.4	Identify and implement management strategies to allocate more staff time to LCP planning, coordination and updates.	As funding for FY 2013/2014 has been secured, has staff completed a management strategy for at least year one?	
			What is the plan to allocate more staff time to LCP planning, coordination, and updates?	
			When is staff augmentation (i.e. hiring of additional staff) slated to begin & when will hiring be substantially completed?	
			Does staff envision movement of existing staff/resources from other program areas to LCP planning, coordination, & updates?	
4.3.	Provide and Maintain Certified LCPs Online			
	4.3.1	Develop a phased strategy to acquire and provide LCPs in a digital library format, as resources allow.	What does a "needs and assesment report" look like? When is it anticipated that such a report will be completed?	
			Are additional funds not anticipated for this Action Item?	
			Is it envisioned that an outside contractor will assist with I.T. services, or will this Action Item be peformed by staff?	
	4.3.2	Implement a pilot project to identify issues and draft protocols and procedures related to acquiring and maintaining digital LCPs.	Are additional funds not anticipated for this Action Item?	
			Is it envisioned that an outside contractor will assist with I.T. services, or will this Action Item be peformed by staff?	
			As this Action Item is anticipated to be completed by 2014, is there an existing plan for implementing a pilot project?	
	4.3.3	Under the phased strategy in 4.3.1, secure resources to support acquisition and review accuracy of existing LCPs. Identify and correct any discrepancies between certified versions and those in use by the affected jurisdictions.	Your notes state that the "Current federal grant budget supports approximately 12," yet the item is marked "Deferred." How much funding is available through the federal grants budget to execute this Action Item? How much additional funding is needed to execute this Action Item?	

	4.3.4	Integrate the digital LCP library with Coastal Data Management System Design (see also Action 6.4.3).	Your notes state that the "Current federal grant budget supports approximately 12," yet the item is marked "Deferred." How much funding is available through the federal grants budget to execute this Action Item? How much additional funding is needed to execute this Action Item?	
4.4. Continue to Improve Communication and Planning with Local Government				
	4.4.1	Work with League of Cities and California State Association of Counties to hold periodic Commission-local officials and/or local staff LCP workshops.	How many workshops total will be held each year? Will there be a goal for a certain number of workshops in each region per year?	
			Is staff augmentation anticipated to achieve this action item, or will this be accomplished with existing staff?	
			What is the annual funding amount anticipated to accomplish this goal? Will the Commission need to request this funding from a state budget allocation, or will funding come from outside sources?	
	4.4.2	Continue to convene District-level meetings as feasible with local government staffs on a regular or as-needed basis to enhance coordination and communication.	How are these meetings different than the workshops proposed in 4.4.1?	
			Does staff anticipate these meetings occurring at the current regular or as-needed basis by which it meets with municipalities?	
			What is the current annual rate of similar meetings held with municipalities? How many total? Per region?	
			It is noted in the strategic plan that this item requires a major amount of funding (\$\$\$). Has the funding been secured for the current FY?	
	4.4.3	Work with local government staff to establish regular working sessions/meetings on significant or comprehensive LCP updates prior to local approval of the LCP amendment. Conduct pre-submittal conferences on major LCP Amendments (see also Objective 4.2).	Is there a minimum expected number or average expected number of anticipated working sessions & pre-submittal conferences per LCP submittal?	
			It is noted in the strategic plan that this item requires a major amount of funding (\$\$\$). Has the funding been secured for the current FY?	
	4.4.4	Provide information regarding the status of LCP Amendments online (see also Action 5.2.4).	Will this work be prepared using internal resources, or is it envisioned that an outside I.T. contractor will be secured?	
			What is the amount envisioned to successfully accomplish this Action Item?	
			Is it the plan of staff to continue forward with this item, or is it no longer being pursued as part of the strategic plan?	
	4.4.5	Increase training on the LCP program and key coastal zone policy issues for local staff and officials as requested and feasible. Present background information on the Coastal Act and LCP implementation to local governments as requested and feasible.	How is this Action Item different from what is envisioned in 4.4.1 and 4.4.2?	
			What is the amount envisioned to successfully accomplish this Action Item?	
			Is it the plan of staff to continue forward with this item, or is it no longer being pursued as part of the strategic plan?	
	4.4.6	Pursue joint LCP funding strategy with local government (see Action 7.4.2).	This is marked as "complete/in progress." Can you explain what this means and what are the steps taken to pursue a joint LCP funding strategy?	

			Is there anything envisioned beyond the state budget augmentation that is needed for local governments to participate in this LCP funding strategy?	
			What are the steps that will be taken to pursue a joint LCP funding strategy with local government for the next FY?	
4.5.	Improve LCP Implementation			
	4.5.1	Evaluate post-certification monitoring procedures and requirements; develop recommendations for improved final local action noticing, tracking, review, evaluation, reporting, and feedback to local governments.	When is it anticipated that the work to develop recommendations for improved FLAN's will begin?	
			Is there a target date for draft recommendations to be completed?	
			Is there a target date for recommendations to be finalized?	
			Will these recommendations come before the commission, and if so, when is this anticipated to occur?	
			It is noted in the strategic plan that this item requires a major amount of funding (\$\$). Has the funding been secured for the current FY?	
	4.5.2	Implement an online Final Local Action Notice (FLAN) posting system for locally-issued CDPs.	Does it make sense to progress with this Action Item when the previous Item is being deferred, or is it better to wait for recommendations for improved FLAN's prior to implementing an online FLAN posting system?	
	4.5.3	Provide guidance and staff training to improve and streamline post-certification monitoring as appropriate.	This is anticipated as being completed by the end of 2014. Are training manuals being developed for these staff trainings? If not, when is this anticipated to occur?	
			Is staff training meant to occur on a regular basis, or will this be a one-time event?	
	4.5.4	Evaluate the feasibility and consider implementing periodic LCP reviews to support LCP updates.	Will a feasibility report be conducted on this to determine the costs and time needed to implement periodic reviews? If so, when is the expected start & completion date for such a report?	

## **C. ORGANIZATIONAL GOALS, OBJECTIVES, AND ACTIONS**

The Agency also has four priority organizational goals that will strengthen its ability to achieve the program policy goals. These are to: Strengthen the LCP Program; Improve the Regulatory Process, Compliance and Enforcement; Enhance Information Management and E-Government; and Build Agency Capacity (including public communications and program funding, and addressing human resources concerns).

### **GOAL 4: Strengthen the LCP Planning Program**

While the Commission has achieved much through the Coastal Act's state-local partnership, the stresses of inadequate resources for on-going coastal planning have exacerbated conflict surrounding the LCP amendment process. There is a need to reinvest in LCP planning and comprehensive LCP updates to address on-going and dynamic coastal resource management challenges. There is also a need to consider changes in process at both the Commission and local level that may facilitate improved communication and collaboration, notwithstanding inadequate resources. The continued success of the coastal program is directly tied to the state-local partnership and the program's ability to keep LCPs current and responsive to on-going and emerging resource management challenges. Furthermore, many of the actions defined in Goals 1, 2 and 3 compliment the objectives and actions of Goal 4.

One of the important LCP strategies explained below concerns completing the certification of LCPs. While most of the coast (approximately 85% of the geographic area) is governed by a certified LCP, the remaining uncertified areas continue to pose a significant coastal permit workload for the Commission that should be the responsibility of local government. Actions are identified to pursue priority LCP certification targets, which should free up Commission resources over the long run to address on-going LCP planning needs in already-certified jurisdictions.

Other LCP objectives and actions are identified that will improve LCP program implementation. These include actions to support the updating of LCPs, to provide LCP documents in digital form and make them available online. Given the central role of LCPs in implementing the Coastal Act, it is critically important that they be up-to-date and available to the public. Objective 4.4 provides for continuing the Commission's on-going efforts to improve communication with local government and to improve Commission oversight and collaboration with local government concerning the coastal development process at the local level.

#### **Objective 4.1 – Pursue Completion of LCP Certification for uncertified segments and Areas of Deferred Certification (ADC) Where Feasible**

Actions:

- 4.1.1 Evaluate uncertified jurisdictions and ADCs; identify priority areas for LCP and ADC certification.
- 4.1.2 Conduct outreach and feasibility analysis for LCP and ADC certification(s) in identified priority areas.

- 4.1.3 Where local jurisdictions are willing, work together to identify funding and workload management strategies to support development and certification of LCPs and ADCs.

#### **Objective 4.2 – Work with Local Governments to Update LCPs Where Feasible**

Actions:

- 4.2.1 Identify LCPs most in need of a comprehensive update, and prioritize these LCPs by ongoing or potential impacts to coastal resources. Consider alternatives to full periodic reviews to identify issues that need addressing in certified LCPs.
- 4.2.2 For priority LCPS, work with local governments to evaluate feasibility of updates.
- 4.2.3 Provide and update online guidance to local governments for updating LCPs to improve the transmittal of key planning and policy information related to:
  - (a) Climate change impacts, adaptation, and mitigation;
  - (b) Shoreline protective options and mitigation strategies;
  - (c) Evaluation of ESHA;
  - (d) Wetland delineations; and
  - (e) Protection of agricultural lands.
- 4.2.4 Identify and implement management strategies to allocate more staff time to LCP planning, coordination and updates.

#### **Objective 4.3 – Provide and Maintain Certified LCPs Online**

Actions:

- 4.3.1 Develop a phased strategy to acquire and provide LCPs in a digital library format, as resources allow.
- 4.3.2 Implement a pilot project to identify issues and draft protocols and procedures related to acquiring and maintaining digital LCPs.
- 4.3.3 Under the phased strategy in 4.3.1, secure resources to support acquisition and review accuracy of existing LCPs. Identify and correct any discrepancies between certified versions and those in use by the affected jurisdictions.
- 4.3.4 Integrate the digital LCP library with Coastal Data Management System Design (see also Action 6.4.3).

#### **Objective 4.4 – Continue to Improve Communication and Planning with Local Government**

Actions:

- 4.4.1 Work with League of Cities and California State Association of Counties to hold periodic Commission-local officials and/or local staff LCP workshops.

- 4.4.2 Continue to convene District-level meetings as feasible with local government staffs on a regular or as-needed basis to enhance coordination and communication.
- 4.4.3 Work with local government staff to establish regular working sessions/meetings on significant or comprehensive LCP updates prior to local approval of the LCP amendment. Conduct pre-submittal conferences on major LCP Amendments (see also Objective 4.2).
- 4.4.4 Provide information regarding the status of LCP Amendments online (see also Action 5.2.4).
- 4.4.5 Increase training on the LCP program and key coastal zone policy issues for local staff and officials as requested and feasible. Present background information on the Coastal Act and LCP implementation to local governments as requested and feasible.
- 4.4.6 Pursue joint LCP funding strategy with local government (see Action 7.4.2).

**Objective 4.5 – Improve LCP Implementation through Monitoring of Locally-issued Coastal Develop Permits and Instituting Feedback Mechanisms**

Actions:

- 4.5.1 Evaluate post-certification monitoring procedures and requirements; develop recommendations for improved final local action noticing, tracking, review, evaluation, reporting, and feedback to local governments.
- 4.5.2 Implement an online Final Local Action Notice (FLAN) posting system for locally-issued CDPs.
- 4.5.3 Provide guidance and staff training to improve and streamline post-certification monitoring as appropriate.
- 4.5.4 Evaluate the feasibility and consider implementing periodic LCP reviews to support LCP updates.

**GOAL 5: Improve the Regulatory Process, Compliance and Enforcement**

This goal identifies various objectives to improve the Commission's regulatory processes ranging from updating the Commission's regulations to building condition compliance and enforcement capacity. A variety of improvements and updates could be made to reflect the Commission's experience and to facilitate streamlining of the permit process. This goal also includes actions to improve the accessibility, clarity, and relevance of information and services to the public, such as improvements to the Commission's website and an online permit application system.

Condition compliance continues to be a major workload issue for the Commission and Objective 5.3 lays out actions to improve the condition compliance work of staff, including efforts to evaluate and consider changes that may improve the efficiency of reviews of recorded

# Appendix A. Coastal Commission Strategic Plan Action Implementation Schedule

2.3.2	Facilitate Improved Communication among Responders				
<b>Coastal Resources 2.4. Improve Water Quality Protection and Impact Mitigation</b>					
2.4.1	Evaluate Effectiveness of Permit Conditions and LCP Amds				
2.4.2	Update LCP Water Quality Protection Guidance				
2.4.3	Promote WQ Protection Policies and Practices				
2.4.4	Develop tools and policies to track and address MPA impacts				\$\$
<b>Coastal Resources 2.5. Protect and Maximize Agriculture</b>					
2.5.1	Update Agriculture LCP Guidance				
2.5.2	Explore Options for Expedited Permit Review for Agriculture				\$\$
2.5.3	Conduct Agricultural Workshop				
2.5.4	Explore use of Agricultural land protection mechanisms				\$\$
<b>Climate Change 3.1. Develop LCP &amp; Permitting Guidance</b>					
3.1.1	Adopt LCP & Permitting Sea Level Rise Guidance				
3.1.2	Develop Coastal Hazards LCP & Permitting Guidance				\$\$
3.1.3	Develop Climate Change LCP and Permitting				\$\$
3.1.4	Provide Public Information on Adaptation Planning				\$\$
3.1.5	Participate in Climate Action Team				\$
3.1.6	Coordinate with NRA/OPR/CEMA re Hazard Mitigation Plans				\$\$
3.1.7	Coordinate with State Lands Commission re SLR & Public Trust				\$\$
<b>Climate Change 3.2. Assess Coastal Resource Vulnerabilities</b>					
3.2.1	Conduct Assessment of Urban/Rural Areas				\$\$
3.2.2	Work with Partners to Assess Transportation Infrastructure				\$\$
3.2.3	Work with DWR/SWRCB to Assess Water/Wastewater Infrastructure				\$\$\$
3.2.4	Work with Partners to Assess Natural Resources				\$\$\$
3.2.5	Work with Coastal Observing System re Monitoring Baseline				\$
3.2.6	Implement Grant Program with SCC/OPC to support LCP Updates				
<b>Climate Change 3.3. Reduce Greenhouse Gas Emissions</b>					
3.3.1	Evaluate Policy Options to Promote Smart/Sustainable Growth				\$\$
3.3.2	Develop Policy Guidance to Expedite Alternative Energy				\$
3.3.3	Provide Public Information re GHG Reduction				\$\$
3.3.4	Reduce GHG Footprint of Commission's Operations				
<b>Local Coastal Programs 4.1. Pursue LCP Certification</b>					
4.1.1	Evaluate Uncertified Jurisdictions & ADCs				
4.1.2	Conduct Outreach/Feasibility Analysis for LCP Certification				
4.1.3	Implement LCP Certification Strategy				\$\$\$
<b>Local Coastal Programs 4.2 Update LCPs</b>					
4.2.1	Identify Priority LCP Update Needs				
4.2.2	Evaluate Feasibility of Updates				
4.2.3	Update Online LCP Guidance				
4.2.4	Implement Staff Management Strategies to Support LCP work				
<b>Local Coastal Programs 4.3. Develop "Digital" LCPs</b>					
4.3.1	Develop Strategy to Provide Digital LCPs				
4.3.2	Implement Pilot Project				
4.3.3	Implement Digital LCP Acquisition Strategy				\$\$
4.3.4	Integrate Digital LCPs with Data Management System				\$\$
<b>Local Coastal Programs 4.4. Improve Local Government Communication</b>					
4.4.1	Conduct Periodic Local Government Workshops				\$

## Appendix A. Coastal Commission Strategic Plan Action Implementation Schedule

4.4.2	Convene District-level Coordination Meetings				\$\$\$
4.4.3	Conduct Early Coordination on Major LCP Amds/Updates				\$\$\$
4.4.4	Provide LCP Amendment Status Information Online				\$\$
4.4.5	Increase LCP Training/coordination for Local Government				\$\$\$
4.4.6	Pursue Joint LCP Funding Strategy with Local Government				
<b>Local Coastal Programs 4.5. Improve LCP Implementation</b>					
4.5.1	Evaluate and Improve Post-certification Monitoring				\$\$
4.5.2	Implement Online Posting of Final Local Action Notices				
4.5.3	Provide Training on Post-certification Monitoring				
4.5.4	Evaluate Feasibility of Implementing LCP Periodic Reviews				\$\$\$
<b>Regulatory Programs 5.1. Update Code of Regulations</b>					
5.1.1	Assess Feasibility of Update				
5.1.2	Identify Priority Regulation Updates				\$
5.1.3	Initiate Update of Regulations				\$\$
<b>Regulatory Programs 5.2. Improve Public Information and Service</b>					
5.2.1	Update Commission Website				\$\$
5.2.2	Develop Online Permit Application System				\$\$
5.2.3	Conduct Stakeholder Surveys on Public Services				\$\$
5.2.4	Provide Permit/LCP Status Information Online				\$\$
<b>Regulatory Programs 5.3. Ensure Condition Compliance</b>					
5.3.1	Evaluate Status of Condition Compliance				\$\$
5.3.2	Improve Condition Compliance Monitoring				\$\$
5.3.3	Evaluate Options to Streamline Recorded Documents Protocols				\$
<b>Regulatory Programs 5.4. Increase Compliance with Coastal Act</b>					
5.4.1	Evaluate Enforcement Options to Reduce Unpermitted Development				\$\$
5.4.2	Develop Enforcement Public Information Outreach Strategy				\$\$
5.4.3	Enhance Enforcement Tools for Public Outreach				\$\$
5.4.4	Establish Interagency Enforcement Task Forces				\$\$\$
5.4.5	<i>Secure Administrative Penalty Authority to address Violations</i>				
5.4.6	<i>Seek Program Changes to address Violations through Permitting</i>				
5.4.7	<i>Seek Increased Staffing for Enforcement Program</i>				
5.4.8	<i>Enhance Enforcement Program through Cross-cutting strategies</i>				
<b>Regulatory Programs 5.5. Improve Federal Consistency Program</b>					
5.5.1	Update List of Federal Permits				
5.5.2	Develop Geographic Location for Federal Activities				\$\$
<b>Information &amp; E-Government 6.1. Integrate Databases</b>					
6.1.1	Consolidate/integrate Commission Databases				
6.1.2	Develop web interface for CDMS				
6.1.3	Move Historical Data into CDMS				
6.1.4	Train Commission Staff to use CDMS				
6.1.5	Deploy Public web interface for CDMS				\$
6.1.6	Provide CDMS Permit and LCP Data to Public via Internet				\$
<b>Information &amp; E-Government 6.2. Integrate GIS into Planning and Permitting</b>					
6.2.1	Integrate GIS with CDMS				
6.2.2	Develop digital CCC boundary maps				
6.2.3	Enhance GIS tools to support staff reports and presentations				
6.2.4	Provide Staff Training on GIS Analysis				