

CALIFORNIA COASTAL COMMISSION

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March 20, 1997

TO: Commissioners and Interested Persons

FROM: Tami Grove, Deputy Director
Elizabeth Fuchs, AICP, Manager, Land Use Unit

SUBJECT: **Regional Cumulative Assessment Project: Recommendation for Initiation of next Periodic Review**

Background: Coastal Commission staff recently completed a multi-year program designed to improve the understanding and management of cumulative impacts affecting key coastal resources. A central focus of this work was also to develop an improved mechanism to review the implementation of policies of the California Coastal Management Program (CCMP) through Local Coastal Programs (LCPs) as envisioned by Section 30519.5 of the Coastal Act. A summary of this program - the Regional Cumulative Assessment Project (ReCAP) is included as Attachment A of this report. This program resulted in development of the *Procedural Guidance Manual for Conducting Regional Periodic Reviews*. At its meeting of February 6, 1997, the Commission endorsed following this manual in additional program reviews. At that time, staff indicated that a recommendation on where to initiate the next review would be brought back to the Commission for concurrence.

Staff Recommendation: Staff recommends that the Commission concur in the initiation of a Regional Periodic Review in the Santa Monica Mountains/Malibu/Ventura County area of the South Central District.

Discussion: At its meeting of February 6, 1997, in addition to reviewing and concurring with use of the Procedural Guidance Manual, the Commission also concurred with submittal of the updated Assessment and Strategy to the federal Office of Coastal and Ocean Resource Management (OCRM) to participate in the Section 309 enhancement grant program for FY 1997-FY 2000. Initiating additional regional cumulative assessments and periodic reviews is a central component of this adopted strategy for enhancing the coastal management program. Because of limited Commission resources, this important planning and program review work is only possible because additional funding is available through the federal Section 309 enhancement grant program. As such, the staff is currently able to conduct one regional cumulative assessment at a time. Therefore, the selection of the next area for program review should reflect where the Commission next wants to focus limited resources.

Basis for Selection: As outlined in the *Procedural Guidance Manual*, staff considered several factors in recommending where to conduct the next review, including:

- areas where LCPs are being prepared or have LCPs which have been amended many times and are overdue for LCP Periodic review;
- areas where LCPs problems raise issues of statewide or regional significance;
- areas where general plan updates may be planned;
- areas that have undergone significant change or have significant development pressure;
- areas with priority resource problems;
- areas where significant resources that may be threatened;
- areas with interested local governments;
- areas with other regional planning efforts which may provide opportunities for coordination and cooperative analysis and problem solving.

Staff reviewed several candidate regions in each district based on the factors noted above. Attachment B summarizes staff's assessment of these candidate areas. Attachment C lists the dates when 5-year reviews were due for certified LCPs. While resource protection issues are critical in all areas of the coast outlined in Attachment B, limited staff resources force identification of priorities for long range planning and review efforts. The ongoing and future development pressures, the range of coastal resource issues, and the potential to assist local governments in completion of their LCPs while conducting a periodic review of coastal management efforts to date support the selection of the Malibu/Santa Monica Mountains/Ventura County area as best suited for initiation of the next ReCAP.

Next Steps: According to the program set forth in the *Procedural Guidance Manual*, after a region is selected, the next step is to identify priority issues which will be the focus of evaluation during the review. The identification of priority issues will be based on the following: known or suspected resource based problems, especially those involving cumulative impacts; information from local government coastal staff and Commission staff based on monitoring experience; the level of importance or benefit to the general public; and available staff resources. Identification of priority issues will not be dependent on jurisdictional lines. Possible issues to be examined in the review could include impacts of growth on public access and infrastructure, cumulative watershed impacts and polluted runoff. According to the proposed schedule outlined in the *Procedural Guidance Manual*, the initiation of the review, training of the area office staff and the identification of priority issues for the review is estimated to be completed by late May 1997.

Attachment A:

Excerpts from *Procedural Guidance Manual: Conducting Regional Periodic Reviews*

This manual describes the procedures for conducting a regional periodic review of aspects of the California Coastal Management Program, including an assessment of cumulative impacts to key coastal resources. The manual takes the analyst step-by-step through the new regional periodic review process – from identification of critical regional issues, to clarification and assessment of what is causing resource impacts, to the development and implementation of specific program improvements.

Background to the New Regional Periodic Review Process

During reauthorization of the federal Coastal Zone Management Act (CZMA) in 1990, Congress included amendments to the Act which establish a grant program for states to enhance their coastal management programs in priority issues areas based on an assessment of the needs of the program and a strategy to address those needs. Under this Section 309 Enhancement Program, and after an extensive public process, the Coastal Commission adopted an Assessment in January, 1992. Through this assessment, cumulative and secondary impacts, wetlands and hazards were identified as priority program areas needing improvements; the Commission subsequently adopted a strategy to address these needs in March, 1992.

The strategy adopted by the Commission was designed as a multi-year work plan to develop improved ways to manage cumulative impacts of coastal development based on the Commission's authority mandated in the Coastal Act (Section 30519.5) to periodically review the implementation of Local Coastal Programs. The Regional Cumulative Assessment Project (ReCAP) comprised the core of this strategy. It had four key objectives:

Cumulative impacts are the combined effects of a series of development activities within a particular region or ecosystem. Although an individual project may not greatly affect the natural or human environment, the cumulative impacts created by many different projects over time may significantly alter these environments. The CCMP emphasizes the importance of considering cumulative impacts by defining the term in section 30105.5 of the Coastal Act.

- Develop a transferable process to review Coastal Act and LCP implementation on a regional basis and develop a new framework to review LCPs more efficiently;
- Assess the cumulative impacts of permitting on wetlands, hazards and access resources through a pilot project;

- Develop a data base for analysis and continued program monitoring and review; and
- Integrate efforts with other ongoing regional agencies and programs.

Over the next few years, staff periodically briefed the Commission on the progress in the strategy work plans and sought the Commission's input. By 1995, the ReCAP pilot project was completed and staff presented the results to the Commission. Based on that work, a new framework for conducting regional periodic reviews of coastal program implementation was developed. This manual provides guidance for carrying out the new regional periodic review process. The new approach to the process allows the Commission to better fulfill its mandate for program evaluation and LCP review, while simultaneously improving the overall management of cumulative impacts to key coastal resources.

The Role of Periodic LCP Reviews

Periodic reviews are the Commission's means of evaluating whether the Coastal Act is being effectively implemented through the plans and actions of local governments. Under the Coastal Act, Local Coastal Programs (LCPs) are the primary vehicle for successful shared management of coastal resources. Once certified by the Commission, LCPs guide the local government in managing coastal resources and issuing permits for development in the coastal zone. The Commission continues to issue some permits, hears appeals of local government actions, reviews and certifies amendments to the LCP, and monitors and reviews the implementation of the Coastal Act through the LCPs and the local permitting process. Thus, management of coastal resources in California is a partnership between the Commission and coastal local governments.

In statutorily establishing the California Coastal Management Program (CCMP), the Coastal Act provides a means to evaluate, monitor, and continually update these plans to respond to new information and changing conditions and to determine whether previously certified LCPs are being carried out consistent with Chapter 3 of the Coastal Act. This is known as the LCP review process.¹ In spite of the Coastal Act mandate for periodic reviews of Local Coastal Programs, and in spite of their importance to the overall coastal management program, the Commission has not had the resources to review individual LCPs on a regular basis.

This program evaluation component of the LCP program is even more important considering the status of many LCPs. The major LCP planning effort took place in the 1980s. About 43 LCP segments (roughly 51%) were certified well over five years ago and periodic reviews are long

¹ Section 30519.5 of the Coastal Act mandates that the Commission "review every certified local coastal program to determine whether such program is being effectively implemented in conformity with the policies of [the Coastal Act]."

overdue. Since the early 1980s, some of these areas have undergone significant changes, much more is known about the resource values and coastal processes than when the LCPs were developed, newly listed species of concern have been identified, and areas have been identified where coastal water quality is declining. While LCPs have been amended in that time, such amendments are usually project related and few contain full updates of the LCP. Effective coastal management requires that the land use plan and implementation is periodically reviewed and updated to reflect new information and changing conditions in order to provide sound guidance to individual permit and amendment decisions.

The Commission's strategy recognizes the potential role of periodic LCP reviews as a vehicle to address management of cumulative impacts, but also recognizes their limitations. LCP reviews provide an opportunity to evaluate the policies and procedures by which cumulative impacts are managed by local governments. However, they provide no evaluation of the Commission's own permit activities. Moreover, because cumulative impacts are often regional in scope, managing them requires looking beyond one individual LCP at a time, sometimes even beyond the coastal zone boundary itself, to understand the causes of those impacts.

Instead of reviewing the implementation of every policy in an individual LCP or the Coastal Act, the new process focuses on improvements to the management of key resources where the most significant problems have been identified, even if those problems were not evident during the original development of the LCPs or if they are problems that cover a geographic region that spans numerous LCPs. By evaluating several LCPs simultaneously and focusing efforts on the highest priority issues, the new process is more efficient, and allows regional solutions to be developed. Because it considers the Commission's own planning and regulatory activities as well as those of local governments, the new process also represents a more complete assessment of how well the CCMP partnership is working to protect and manage critical coastal resources and address cumulative impacts. It can be an important feedback mechanism for the Commission to evaluate the overall effectiveness of its own actions. Finally, when a review is complete, Area Office analysts will have new tools and data that will enable them to consider cumulative impacts more effectively during subsequent individual permit and LCP amendment review activities.

The new process also provides a way for Area Offices to share their knowledge and experience in conducting regional periodic reviews. This guidance manual is designed as a "living document." Each time a review is completed, this guidance manual can be quickly and easily updated with new tools developed during that review. The binder format of the manual allows changes to individual chapters, as well as the updating or addition of new tools for conducting reviews.

How the New Process Works

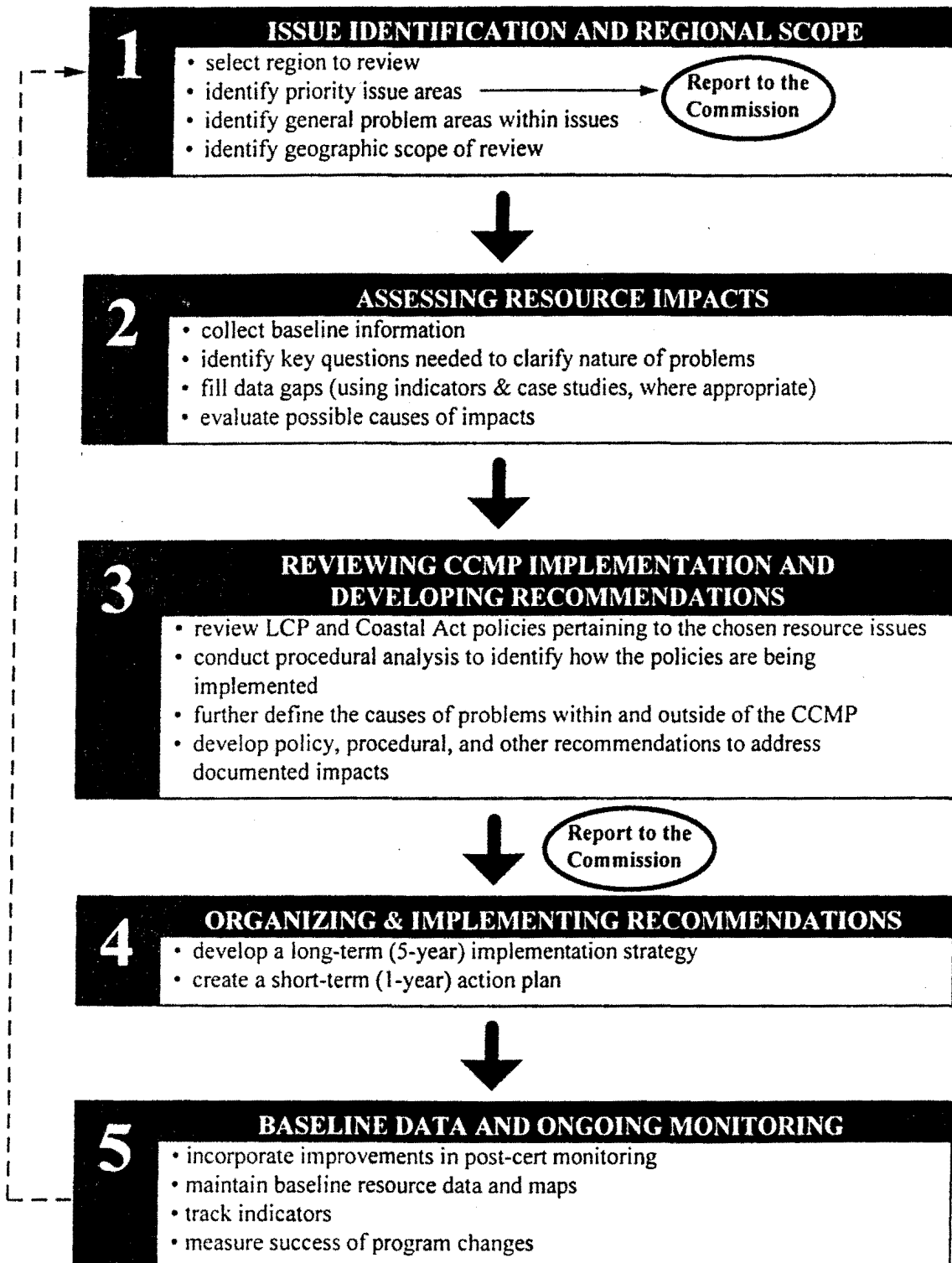
The new regional periodic review process is intended to be implemented in one Commission Area Office at a time. The process begins with the selection of a District and an identification of the most critical resource issues within the chosen District. Exhaustive review of all potential resource issues in all Area Offices simultaneously would be beyond the Commission's staff and budget constraints. Instead, the process involves one Area Office at a time and takes advantage of existing knowledge in the Commission's Area Offices and that of local governments to identify the most critical issues needing to be addressed now, recognizing that other issues in other Area Offices can be addressed in subsequent reviews. The intent is that regional periodic reviews will occur in each Area Office approximately every 5 years, each time focusing on the District's highest priority issues at that time.

The issues for that District are selected based on staff's knowledge and existing evidence of problems, as well as information on the activities of other local and regional resource agencies. An analysis of available data is conducted to document the status of the resources at issue and to clarify the causes of impacts to those resources, particularly cumulative impacts. Next, the process evaluates the implementation of key policies and procedures in the region's LCPs, as well as the Commission's own planning and regulatory activities, for their role in contributing to those impacts. Specific recommendations are then developed to address the problems.

The process also lays the groundwork for better monitoring and management of cumulative impacts in the future. As part of the regional periodic review, analysts create a regional assessment of the status of critical coastal resources using key indicators. When evaluating future projects and LCP amendments, Commission analysts will be able to access and update this resource information, enabling them to detect potential cumulative impact problems earlier and respond with appropriate management techniques in day-to-day permit review and LCP amendment activities.

This process is designed to be carried out as a team effort by staff of the headquarters and Area Offices. Specific divisions of responsibility will be developed by the team during start-up of a ReCAP project, but in general, it is suggested that the headquarters staff conduct overall background analysis such as pre-review data development and coordinate mapping services. The Area Office staff is best able to take the lead on tasks related to specific local outreach and analysis of specific LCP policies and implementation.

Chapters / Steps



Attachment B
Candidate Areas for Regional Review

District/area	LCP factors of Concern	Growth/development factors of Concern	Resource Factors of Concern	Other Factors of Concern
Del Norte County/Crescent City	5 year review due 1989; General Plans updated 1988 & 1976; many amendments;	Not much development activity/pressure		
Humboldt County/Arcata/Eureka/Shelter Cove	5 yr. review due 88/94/90; Trinidad review done in 89.	Low development rate	Shoreline erosion/access	Could use focused ReCAP to resolve ADCs
Mendocino/Sonoma/Marin	Marin/Sonoma review due 86/87; each has 22+ amendments; General Plan updates possible. Mendocino certification completed recently	Development pressure from increased subdivision in Mendocino- parceling of shelf; growth from subdivision may be too much to keep Highway 1 at 2 lanes;	Impacts of growth on maintaining rural 2 lane Highway 1 and reserving capacity for priority uses.	Mendocino LCP itself calls for review every 5 years to review cumulative impacts; may provide statewide guidance on visitor uses to increase access without more traffic.
San Francisco	5 yr. review due 1991	minimal development activity	urban shoreline	
San Mateo County/cities	5 yr. review due 86-89; General Plan updated 86; many amendments	Potential future growth issues with expansion of infrastructure.	Traffic, access and parking issues; agricultural preservation.	ABAG funding regional study; countywide transportation study proposed.
Central Coast Area/ So. Monterey & San Luis Obispo	ReCAP pilot completed in 95-96 in north part of District; SLO Co. LCP completed in 1988.			
Santa Barbara	5 yr. review due 87; General Plan updated 1980; many amendments;	City of Santa Barbara mostly built out; Carpinteria site related issues	Access issues in North county and gated areas.	
Ventura Co. Cities /Oxnard	5 yr. reviews due 88/90; General Plan recent updates 94/90	minimal development activity; built out area	Shoreline erosion threatening public access facilities; wetlands; poor existing lot patterns	
Malibu City/LA/Ventura Co.	City General Plan done 1995; LA County LUP certified in 1984; Ventura Co. certified.	Continued development pressures in LA Co. And Malibu City area; growth pressure in Ventura Co. slower	Access; impacts of build out of small lots; service capacity/growth management; steep lots/erosion; significant remaining regional open space;	Creation of City has raised questions regarding the viability of the existing TDC program.

District/area	LCP factors of Concern	Growth/development factors of Concern	Resource Factors of Concern	Other Factors of Concern
South Bay Cities	Cities have no LCPs;	development pressure is for recycling/rebuilding/further intensification	regional access/parking; protection of remaining habitat/open space	important urban public access issues; could focus on needs of inland residents
Long Beach	5 yr. review for Long Beach due 86; General Plan updated 89; many amendments	developed urban area	urban shoreline access issues	
LA City	Few certified LCPs	developed urban area; development pressure is for recycling/rebuilding/further intensification	wetlands, access	
North Orange County/Cities of Huntington Beach/Newport Beach	5 yr. review due 88-90; General Plan updates 91/95;	developed urban area; development pressure is for recycling/rebuilding/further intensification.	urban shoreline access; wetlands/management of Upper Newport Bay.	Other regional efforts include future State Wetlands mitigation bank clearinghouse.
Cities of Laguna/Laguna Niguel	5 yr. Review due 98/95; General Plan updates 83/94/92; LCP relatively recent	Continued development activity	Growth impacts on steep slopes/open space/habitat	
San Clemente	Updating zoning code; LCP not yet done	Infill development	Canyon habitat/open space	
South Orange/Irvine/Aliso	5 yr. Review due 87; General Plan updates 89/95	Continued development activity	Habitat/development activities/access	Area of major NCCP program work.
San Diego North Co. (Del Mar to Oceanside)	Recent certifications; General Plan updates in 70s	Continued development activity	Shoreline erosion; access, parking, upland support	Previous 309 efforts aimed at erosion issues.
San Diego Bay Area/ cities	5 yr. Review for cities due 88-96; General Plan updates 79/83/86/89/94; City updating zoning code	Continued development activity	Urban shoreline issues; water quality.	Multiple jurisdictions Navy and Port; Other planning efforts include Interagency Water Quality Plan being created; RWQCB targeted Bay as one of top 3 priorities.

Attachment C: Due Dates for 5 Year Reviews Based on Dates of Certification

LCP Segments	Date 5 Yr. Review Due	LCP Segments	Date 5 Yr. Review Due	LCP Segments	Date 5 Yr. Review Due
<i>Northern California</i>					
<i>District North Coast Area</i>					
Del Norte County		San Francisco	3/91	San Luis Obispo Co.	3/93
County	10/88	Olympic Club		Morro Bay	1/88
Harbor	8/92	Daly City	3/89	Pismo Beach	4/89
Lopez Creek	12/92	Pacifica	6/87	Grover Beach	2/89
Pt.St.George		Half Moon Bay	4/01	<i>South Central Coast Area</i>	
Crescent City	3/88	San Mateo Co.	4/86	Santa Barbara Co.	8/87
McNamara-	11/89	<i>Central Calif.</i>		Guadalupe	5/96
Gillispie*		<i>District/Central Coast</i>			
		<i>Area</i>			
Humboldt County		Santa Cruz County	ReCAP completed 12/94	Santa Barbara City	11/91
Northcoast	1/91	Santa Cruz City	ReCAP completed 12/94	City	11/91
Trinidad Area	1/91	Capitola	ReCAP completed 12/94	Airport/Goleta	11/91
McKinleyville	1/91	Watsonville	ReCAP completed 12/94	Carpinteria	1/87
Humboldt Bay	1/91	Monterey Co.		Ventura Co.	10/88
Eel River	1/91	North Co.	ReCAP completed 12/94	San Buenaventura	2/89
South Coast	1/91	Del Monte Forest	ReCAP completed 12/94	Oxnard	4/90
City of Trinidad	Completed 7/89	Carmel Area	ReCAP completed 12/94	Port Hueneme	11/89
Arcata	10/94	Big Sur Coast		L.A.Co./Malibu Mtns.	
				Malibu (City)	
Eureka	1/90	Marina	ReCAP completed 12/94	<i>Southern Calif. District/South</i>	
				<i>Coast Area</i>	
Mendocino Co.		Sand City	Completed 9/90	Los Angeles Co.	
Balance	10/97	Seaside		Marina Del Rey/Ballona	12/95
Town	11/01	Monterey City		Playa Vista "A"	
Pygmy Forest		Laguna Grande		Sta. Catalina Is.	1/90
Fort Bragg	8/88	Del Monte Beach		L.A. City	
Point Arena	12/86	Harbor		Pac.Palisades	
<i>North Central Coast Area</i>		Cannery Row		Venice	
Sonoma Co.	4/87	Skyline		Playa Vista	
Marin Co.(Unit I)	6/86	Pacific Grove		Del Rey Lagoon	
Marin Co. (Unit II)	5/87	Carmel City		Airport/Dunes	
				San Pedro	

LCP Segment	Date 5 Yr. Review Due
Santa Monica	
El Segundo	2/87
Manhattan Beach	5/99
Hermosa Beach	
Redondo Beach	
Torrance	
Palos Verdes Estates	12/96
Rancho Palos Verdes	8/88
Long Beach	8/86
Avalon	8/86
Orange Co.	
N/Sunset Beach	10/88
N/Bolsa Chica	
N/Santa Ana River	
N/Sta. Ana Hts.	
Irvine Coast	1/93
Aliso Viejo	9/88
S/Emerald Bay	9/94
Seal Beach	
Huntington Beach	3/90

LCP Segment	Date 5 Yr. Review Due
Costa Mesa	
Newport Beach	
Irvine City	3/87
Laguna Beach	1/98
Laguna Niguel	11/95
Dana Point	9/94
San Clemente	
San Diego Area	
San Diego County	
Oceanside	3/91
Carlsbad	
Agua Hedionda	
Mello I	10/01
Mello II	10/01
W. Batiquitos	10/01
E. Batiquitos	10/01
Carlsbad Village	12/92
Redev. Area	
Encinitas	5/00
Solana Beach	
Del Mar	

LCP Segment	Date 5 Yr. Review Due
San Diego City (all segments)	10/93
North City	
La Jolla	
Pacific Beach	
Mission Beach	
Mission Bay	
Ocean beach	
Peninsula	
Centre City	
Barrio Logan	
Otay Mesa	
Tijuana River V.	
Border Highlands	
Coronado	1/89
National City	7/96
Chula Vista	9/90
So. Bay Islands	
Imperial Beach	8/88