

CALIFORNIA COASTAL COMMISSION

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TO: Commissioners and Interested Parties

FROM: Tami Grove, Deputy Director
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SUBJECT: Recommendation for Preliminary Issues and Regional Project Boundary for Santa Monica Mountains/Malibu ReCAP

Summary of Staff Recommendation:

In March, 1997, the Commission voted to undertake the Commission's Regional Cumulative Assessment Project (ReCAP) in the Santa Monica Mountains/Malibu area. The ReCAP analysis evaluates, on a regional basis, the implementation of California's Coastal Management Program (CCMP) and its effectiveness in managing cumulative impacts to key coastal resources. Commission staff has undertaken the initial steps of the ReCAP process to identify the preliminary priority issues and the preliminary boundary for its analysis in the Santa Monica Mountains region. Staff is recommending that the Commission concur with this focus of the analysis.

The preliminary issues identified for evaluation are:

- **Concentration/location of development, including the TDC program and habitat impacts**
- **Shoreline access, including locations of accessways and parking availability**
- **Shoreline protective devices**
- **ESHA protection issues**
- **Inland trail access**

Although a number of other issues were identified as important to the Santa Monica Mountains area, Commission staff believes the above list represents the key issues where review of the CCMP could provide significant program improvements to addressing the cumulative impacts of development on a regional basis. Due to limited resources, as the project progresses, issues may need to be eliminated in order to complete the evaluation within the estimated 10 month timeframe. Therefore, the issues identified above are listed in the recommended order of priority.

The preliminary regional boundary for the ReCAP analysis runs from Calleguas Creek (the boundary of Point Mugu State Park) to the west to Topanga Canyon in Los Angeles County to the east. The coastal zone, which generally corresponds to the watershed boundary, forms the northern (inland) boundary for the analysis. Point Mugu State Park and Pacific Palisades are proposed to be excluded from the analysis due to the different development patterns, pressures, and issues raised from the rest of the Santa Monica Mountains area.

Discussion:

Background to ReCAP

The California Coastal Commission's Regional Cumulative Assessment Project (ReCAP) evaluates, on a regional basis, the implementation of California's Coastal Management Program (CCMP) and its effectiveness in managing cumulative impacts to key coastal resources. The evaluation includes review and analysis of the implementation of both the Commission's program and procedures and those of local governments' with certified local coastal plans. Under Section 30519.5 of the Coastal Act, the Commission is mandated to periodically review certified local coastal plans to evaluate whether implementation of the plan conforms to the objectives of the Coastal Act. The ReCAP process focuses on 1) identifying resource problems for those issues identified as priority issues in the region; 2) evaluating the causal factors contributing to these problems, including the role of the CCMP; and 3) developing and implementing recommendations to respond to the regional cumulative impacts identified. The resulting information and analysis will also provide valuable input for Los Angeles County's and the City of Malibu's efforts in their LCP development.

The Commission's first ReCAP was undertaken as a pilot project in the Santa Cruz/Monterey Bay area, with federal funding provided by amendments to the federal Coastal Zone Management Act in 1990. From this first pilot project, Commission staff developed a basic methodology for staff to use in undertaking additional ReCAPs in other areas of the coastal zone. This methodology, endorsed by the Commission on February 6, 1997, is detailed in the *Procedural Guidance Manual for Conducting Regional Periodic Reviews* (January, 1997). In March, 1997, the Commission voted to undertake the next ReCAP in the Santa Monica Mountains/Malibu area of the coast.

This staff report discusses the preliminary issues identified as priority issues for the Santa Monica Mountains/Malibu area and outlines the preliminary regional boundary for the analysis. Commission staff recommends concurrence with the preliminary issues identified and with the preliminary regional boundary.

Staff Recommendation

Staff recommends that the Commission adopt the following motion:

MOTION: I move that the Commission **concur** with the preliminary issues and preliminary regional boundary for the ReCAP analysis in the Santa Monica Mountains/Malibu area.

Preliminary Issue Identification

A first step in the ReCAP process is to identify the critical issues in the region (see attachment A). Although many issues may be important, due to limited staff and time, the analysis needs to focus on the highest priorities. Since ReCAP is intended to be an on-going process, additional issues can be reviewed in future analyses.

To identify the preliminary priority issues in the Santa Monica Mountains/Malibu area, staff relied on 1) South Central District staffs' knowledge of the area and issues raised in regulatory review of projects and LCP planning efforts; 2) issues raised in past LCP/LUP reports for the area; and 3) issues raised in a workshop with local governments and other public agencies operating in the area. Attachment B identifies the issues identified from these efforts. This Commission hearing is being held to solicit input from the general public on what issues they view as priorities in the Santa Monica Mountains/Malibu area and to obtain Commission decision on the focus of the ReCAP effort.

Although a large number of issues were raised during the above-described issue scoping process -- all of which are important to the Santa Monica Mountains area -- staff recommends that the list be narrowed to the following priority issues:

- **Concentration/location of development**
- **Shoreline access**
- **Shoreline protective devices**
- **ESHA protection issues**
- **Inland trail access**

Staff believes these represent the key issues where review of the CCMP could provide significant program improvements to addressing the cumulative impacts of development on a regional basis. Although many other important issues were identified, evaluating and addressing these other issues were either 1) best addressed through case by case site review; 2) beyond the available resources of the Commission to undertake; or 3) issues where other agency activities were already addressing the issue.

Due to limited resources, as the project progresses, some issues may need to be eliminated in order to complete the evaluation within the estimated 10 month timeframe. Therefore, the issues identified in the list above are listed in the recommended order of priority.

Issue Discussion

Concentration/Location of Development:

The resources of the Santa Monica Mountains have long been recognized as important to protect. In 1977, the California legislature found:

The Santa Monica Mountains Zone to be a unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource which should be held in trust for present and future generations; ... it exists as a single ecosystem in which change that affects one part may also affect all other parts; and that the preservation and protection of this resource is in the public interest. (Santa Monica Mountains Comprehensive Planning Act).

Throughout its regulatory review of development in the Santa Monica Mountains, the Commission has also recognized the value of the mountains' resources. However, development in the mountains has the potential to significantly impact those resources. Since the inception of the Coastal Act, significant development has occurred in the region. In addition, many of the remaining undeveloped lots are within small lot subdivisions. Much of the Santa Monica Mountains area was subdivided in the 1920s into extremely small lots, which have significant constraints for development. With full buildout of these existing lots, the cumulative impacts to coastal resources would be significant.

In 1978, a report "Cumulative Impacts of Potential Development in the Santa Monica Mountains Coastal Zone", prepared for the Santa Monica Mountains Comprehensive Planning Commission and the Coastal Commission, recommended that land divisions should not be approved if they increased the total number of lots in the Santa Monica Mountains coastal zone, due to cumulative impacts. In addition, Section 30250(a) of the Coastal Act required that land divisions be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

Concerns about protecting sensitive habitat and the impacts from development on sensitive resources also needed to be addressed. The Santa Monica Mountains Comprehensive Planning Act recognized the importance of significant ecological areas and the need to expand these areas into a wildlife network, to form "a minimum ecological backbone necessary to support diverse and healthy population of wildlife". The Commission also has long recognized the importance the Coastal Act gives to protection of sensitive resources. During its review of the proposed LUP for Malibu the Commission determined that entire watersheds in the Santa Monica Mountains required protection.

One method developed by the Commission in 1978 to address all these concerns is a transfer of development credit (TDC) program. The TDC program provides a tool to: 1) direct development to locations most able to support it; 2) address the cumulative impacts of

development by limiting the creation of new lots; 3) reduce potential buildout of antiquated small lot subdivisions by retiring small lots and; 4) protect sensitive habitat by retiring the development potential on sensitive lots. The TDC program was extended to also address the cumulative impacts from multi-unit development.

The TDC program has been a pivotal mechanism for managing development in the Santa Monica Mountains. The program specifically seeks to retire development potential in small lot subdivisions and on lots specifically identified as ESHAs or in significant watersheds. Under the TDC program hundreds of lots have been retired in small-lot subdivisions and ESHAs. However, many small lots and lots in ESHAs and significant watersheds remain undeveloped. Pressure to continue developing in the region remains high, and much of the area continues to face significant constraints to development, including geologic hazards, sensitive resource issues, steep slopes, and infrastructure limitations such as inadequate roads and fire protection.

It is important to evaluate the cumulative effects of development and implementation mechanisms, such as the TDC program, given changed conditions. Since 1978, significant development has been approved, significant lands acquired, and the new City of Malibu has been incorporated. ReCAP will evaluate the effects of development and results of program implementation given these changed circumstances. During the issue scoping process described above, the issue of the impacts of incremental decisions on the concentration and location of development, and the continued effectiveness of the TDC program, was continually raised as a high priority for evaluation. Since one goal of the TDC program is to protect sensitive habitat, one aspect of the ReCAP review will be to analyze how effectively the TDC program has been in protecting sensitive resources in the area.

Although the TDC program has been a primary tool in managing the cumulative impacts from development in the Santa Monica Mountains, both the Commission and local governments have also used other tools to manage development and address impacts from that development; one such tool is the use of a slope density formula. In evaluating the effectiveness of policies and procedures to mitigate impacts on coastal resources from development, the ReCAP analysis may also evaluate the use of these other tools.

Shoreline Access:

The protection and provision of maximum public access is a priority of the California Coastal Management Program. Under the Coastal Act, each LCP is required to contain a specific public access component, and all staff recommendations concerning development located between the first public road and the sea must contain a finding addressing public access impacts.

The Santa Monica Mountains/Malibu shoreline area of Ventura and Los Angeles Counties has significant resources, including roughly 34 miles of shoreline and about 16 state and local beaches which provide significant recreational and aesthetic value. Past LUP/LCP documents, noting the projected growth in the region, identified public access as a major planning issue. In

the City of Malibu, current LCP planning efforts have identified the amount and distribution of access and availability of parking support facilities to be factors in maximizing access. For the Commission, public access to and along the shoreline has been an issue in a significant number of the permits reviewed by the Commission along the Santa Monica Mountains/Malibu shoreline. For example, in the past year, approximately 21% of permits acted on in the area raised potential access issues.

Analysis of the cumulative impacts of growth and development over the last decade or more on the public's ability to reach and use the shoreline is proposed as a priority issue for ReCAP to evaluate. As in the Monterey Bay ReCAP, a cumulative assessment and program review is likely to evaluate how the physical supply of public access has changed over time as a result of the implementation of the CCMP, the impacts of development on the supply and distribution of public access, and the projection of what impacts may occur if present policies continue. The staff will coordinate with efforts already undertaken by the Access Program staff to identify existing OTDs. It is likely that availability of parking will be included in the analysis. However, an analysis of the regional transportation network, also a factor in public access, is not likely to be evaluated, given limitations on staff and resources.

Shoreline Protective Devices:

As shown in attachment C, the California Department of Navigation and Ocean Development (DNOD) identified a significant portion of the area as part of the Santa Monica cell; however, more recent information (attachment D) appears to indicate that the Santa Monica Mountains/Malibu shoreline is part of two cells, with Dume Canyon as the dividing line. Development and infrastructure has encroached upon the area's historically narrow and sediment limited beach environment. Shoreline fortification, resistant bluff formations and rocky outcrops restrict long-term recession while variable winter runoff causes sandy beaches to respond by fluctuating in width. In addition, the Malibu shoreline area has experienced significant storm damage in the last decade. According to the City of Malibu General Plan Safety Element Background Report (Hannan Geotechnical, Inc. and Harland Bartholomew and Associates, inc., 1983), recent events have included the storms of November, 1982, and January and March of 1983, when it was estimated that \$12.8 million in property damage occurred in the area. That report notes:

The U.S. Army Corps of Engineers, in their "Coastal Storm Damage, Winter 1983", indicated that damage to public facilities (San Nicholas Canyon, Zuma Beach, Point Dume, Paradise Cove Pier, Corral Beach, Malibu Surfrider, Malibu Pier, Big Rock Beach and Las Tunas Beach) totaled \$3,124,000 million [sic].

Such storm events can increase the pressure to develop shoreline structures to respond to hazards. As the Commission found in its pilot ReCAP project in Monterey Bay, the proliferation of shoreline armoring can have significant cumulative impacts, including a loss of recreational sandy beach area. The Monterey Bay ReCAP recommended several program changes to address

the problem of beach loss, some of which may be transferable to this Malibu project. The City of Malibu has identified the issue of hazard management and shoreline protection devices as an issue in their current LCP planning. The Commission staff agrees that this issue warrants evaluation of the cumulative effects of development. The ReCAP analysis is likely to examine the extent of armoring and impacts to beach resources as a result of the implementation of the CCMP and project what future armoring could occur should current policy implementation continue. In addition, in developing analysis and recommendations, the ReCAP project can build on the work already completed by the Beach Erosion and Response Task Force which examined existing mechanisms being used statewide to address beach erosion, as well as previous work in the Monterey Bay ReCAP.

ESHA Protection Issues:

Resource protection in the Santa Monica Mountains has long been a priority of several agencies, including the Commission. As noted previously, the implementation of CCMP and LCP policies on the concentration and location of development will be evaluated for its effect on ESHAs. However, the issue of ESHA protection and cumulative impacts to sensitive resources are not fully addressed by evaluating only implementation of concentration and location of development policies. Other policies, including those affecting runoff and sedimentation, grading and vegetation removal, building envelope size, and buffer areas are also important to include in a periodic program evaluation.

However, the breadth of the issue and limited resources require that the scope of the analysis will have to be further defined. In addition, other agencies are currently undertaking analyses of habitat issues in the Santa Monica Mountains. During the initial issue scoping, the National Park Service stated that they are initiating a Habitat Conservation Plan for the Santa Monica Mountains. Staff will be conducting further research to determine what efforts are currently being undertaken to address the issue of ESHA protection. Based on this research, the ReCAP analysis can be scoped further and directed in a manner where it can contribute and integrate into other efforts. Regardless of the scope of those efforts, as discussed previously, the effects of concentration and location of development policies will be evaluated for their effect on sensitive resources.

Inland Trail Access:

The Santa Monica Mountains provide a significant inland recreational resource in the two county area, and a comprehensive trail network traversing the upland area of the mountains and leading from the mountains to the sea has been identified as a key component of that resource. Staff of the state and national park service agencies have stated that the cumulative impacts of development on the provision of maximum public access through an inland trail system is of key concern in the area.

Commission staff agrees that an evaluation of the impacts of future buildout on maximizing trail access is important, given the large population for which the Santa Monica Mountains provides a key recreation resource. However, given limited staff resources, and the significant mapping this would require, staff recommends that this issue is of less priority than the others identified and would be undertaken only if time and resources allow. ReCAP staff will coordinate with the Access Program staff to determine if other ongoing, funded projects may be able to assist with evaluation of this issue.

Preliminary Project Boundary:

As outlined in the *Procedural Guidance Manual for Conducting Periodic Program Reviews*, staff conducted a preliminary analysis of the appropriate geographic scale for each of the priority issues recommended and has developed a preliminary recommendation for the boundary of the ReCAP analysis (see figure 1).

To evaluate the cumulative impacts of the concentration and location of development and related impacts to environmentally sensitive habitat and the continued effects of applicable implementing mechanisms, staff recommends the boundary extend roughly from the eastern boundary of the Calleguas Creek watershed in Ventura County on the west to roughly Topanga Canyon on the east. This western boundary is appropriate in that it would include the portion of the Santa Monica Mountains in Ventura County but would not include Mugu Lagoon, as wetland resources are not proposed as a priority issues for evaluation. The eastern boundary, generally at Topanga Canyon, would be based roughly on the boundary used in earlier LCP planning efforts for Los Angeles County, including development of the Transfer of Development Credit (TDC) Program. It would exclude the Pacific Palisades area primarily because of the different development patterns of that area.

For analysis of shoreline access, the suggested boundary would extend inland from the sea to the first public road. If the staff is able to evaluate inland trails, this boundary may be modified to include inland recreation areas and additional state parks lands to the east of the preliminary boundary at Topanga Canyon.

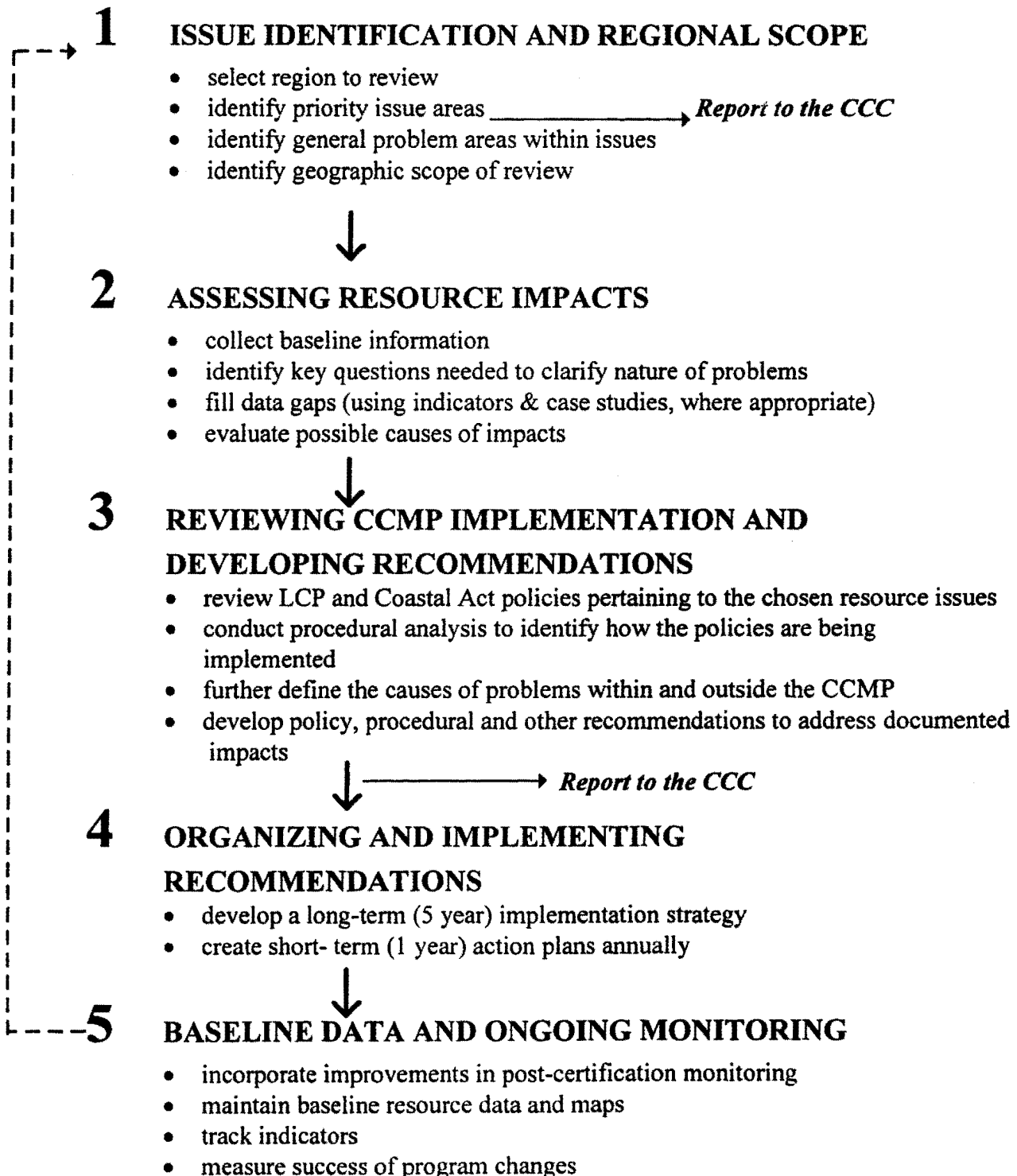
For the analysis of shoreline structures, the Santa Monica Mountains/Malibu shoreline does not consist of a single littoral cell. Ideally, analysis of the impacts of development on sand supply would encompass an entire littoral cell; however, the Santa Monica Mountains/Malibu Shoreline is less developed and distinguished from the more urban LA City and County beaches to the east. The preliminary boundary on the west, which would be at the Calleguas Creek watershed, would avoid extending into the Santa Barbara cell. On the east, the boundary would be coterminous with the project boundaries suggested for analysis of development impacts and would not include the Pacific Palisades.

This boundary is preliminary. It will be refined as staff obtains further data and develops the framework for the analysis.

Conclusion

After public hearing and Commission action on the final selection of priority issues for review, staff will begin the next step in the process: to assess how the resources have changed over time for these key issue areas, analyze the factors contributing to these changes, and project future trends. This status and trends assessments expected to be completed and brought to the Commission for review later this year.

ReCAP: STEPS IN THE REGIONAL PERIODIC REVIEW PROCESS



Malibu/Santa Monica Mountains ReCAP

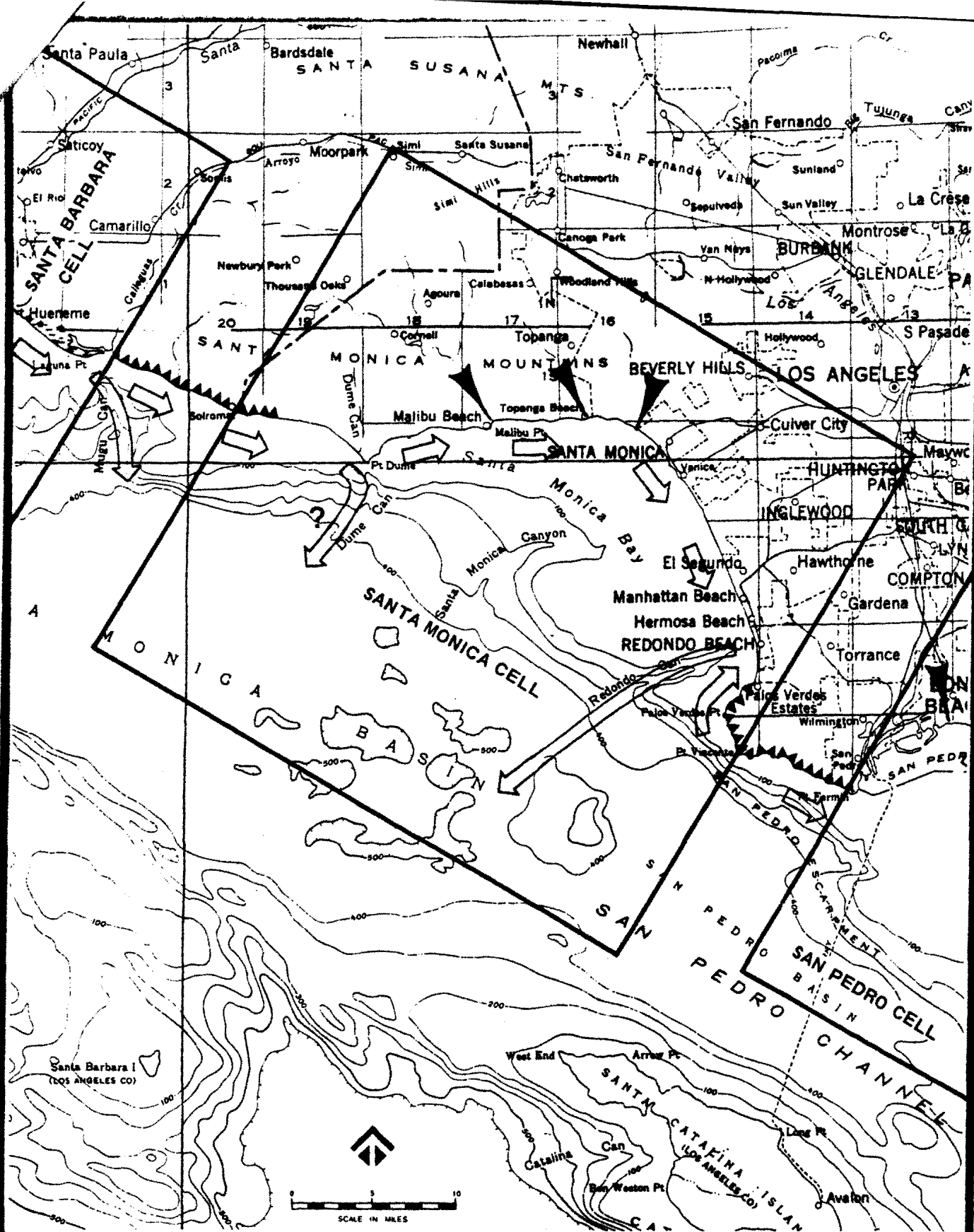
Results of Preliminary Issues Scoping

(** = no order of priority)

(V= Ventura Co./LA = Los Angeles Co./ City= City of Malibu/ DPR=State Parks & Recreation/NPS= National Park Service/RWQCB= Regional Water Quality Control Board)

<i>LCP/LUP past Issues**</i>	<i>Ventura Staff Workshop</i>	<i>Current Priority LCP/LUP Issues**</i>	<i>Local Gov't/Agency Workshop**</i>	<i>ReCAP staff consensus</i>
- Shoreline Access Development-- transportation and access impacts - land and water use impacts on habitat - cliff stabilization - protection of sand flow - development restrictions in hazardous areas - alteration of streams - Malibu Lagoon protection - Significant Ecological Areas (SEAs) - ground water recharge - runoff and erosion - development/build out - intensification of non- residential development - parking - house to lot size - neighborhood integrity - archaeological/pale ontological resources - impacts from septic systems - Areas of Special Biological Significance (ASBS) - wetlands/riparian habitat - fire - shoreline erosion	- Development (TDCs/Slope Density/Small Lots) - Habitat (loss of and changes to; invasive; fire abatement) - Access (1978 buildout study; effect on capacity of infrastructure; parking; armoring) - Seawalls	City of Malibu consultants: - Coastal Access - Second Units - TDCs - Shoreline Protective Devices - Trails - Visitor Serving Uses Los Angeles County: - Land Use - Cumulative impacts of development - Recreation/Trails - Protection of ESHAs (including streams) - Visual Resources (grading and landform alteration) - Hazards (landslides, fire, flooding) Ventura County: - Concentration/Loc ation/Intensity of Development - Water Quality/Polluted Runoff	- Concentration/Inte nsity of development (V;LA;City) - well test standards (V) - polluted runoff (DPR; V) - Small lot buildout (LA) - kelp beds (RWQCB) - Septic systems on beaches (RWQCB) - Breaching Malibu Lagoon (DPR) - Habitat/fuel abatement (DPR) - Habitat loss/connectivity/c onse rvation banking (NPS) - Trails Access (NPS) - Landslides (City) - parking (City) - Seawalls (City)	- Concentration/Loc ation/Intensity of Development (including review of small lot buildout and review of implementation mechanisms of TDC program and Slope/Density policies) - Shoreline Access, including parking availability - Seawalls - Access - Inland Trails

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LEGEND

- PREDOMINANT LITTORAL DRIFT/CURRENT
- MAJOR RIVERS/SEDIMENT SOURCES
- ACTIVE SEACLIFFS/ROCKY COAST
- SANDY BEACH
- SUBMARINE TOPOGRAPHY (100 METER CONTOUR INTERVAL)
- LOCATION OF STUDY AREA (SITE 4)

SCALE 1 INCH EQUALS 10 km
0 10km 20km
6.21mi 12.4mi

SANTA BARBARA CELL

ZUMA CELL

SANTA MONICA CELL

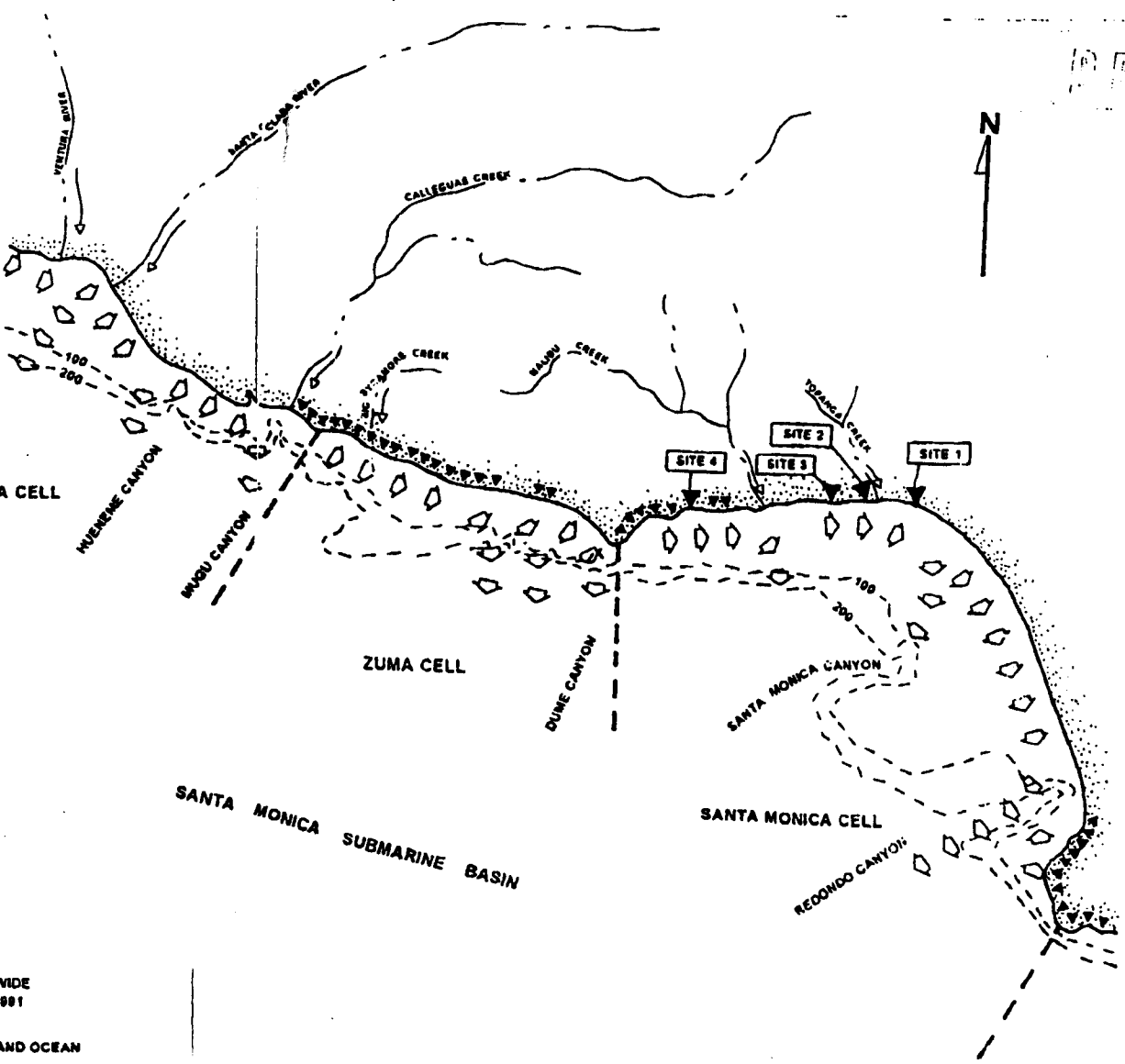
SANTA MONICA SUBMARINE BASIN

SOURCES:

- 1) "TECHNICAL MEMO # 10 - THE MALIBU COAST, A CONTRIBUTION TO THE CITY-WIDE WASTEWATER MANAGEMENT STUDY", BY ANTHONY ORME, DATED DECEMBER 1991
- 2) "LITTORAL CELL DATA, STATE OF CALIFORNIA DEPARTMENT OF NAVIGATION AND OCEAN DEVELOPMENT (DNOD) MAP 10, DATED 1977".

NORTHWEST
GEOTECHNICAL

LITTORAL CELLS OF THE MALIBU COAST		
PROJECT CALTRANS/MALIBU		
BY	DATE	PROJECT NO 1.94.031.1
REV BY	DATE	FIGURE NO. 1A



Regional Cumulative Assessment Project Malibu/Santa Monica Mountains

Figure 1: LOCATION MAP

 Preliminary Study Area
(As described in report)

