

CALIFORNIA COASTAL COMMISSION

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



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July 23, 1999

TO: COMMISSIONERS AND INTERESTED PARTIES

FROM: PETER M. DOUGLAS, Executive Director
STEVEN F. SCHOLL, *AICP*, Deputy Director
ELIZABETH A. FUCHS, *AICP*, Manager, Land Use Unit
TANIA POLLAK, Coastal Program Analyst

SUBJECT: **FINAL ACTION PLAN FOR IMPLEMENTING RECOMMENDATIONS
OF THE SANTA MONICA MOUNTAIN/MALIBU REGIONAL
CUMULATIVE ASSESSMENT PROJECT (ReCAP)**

Attached is the Final Action Plan, adopted by the Commission on June 9, 1999, for the Santa Monica Mountains/Malibu ReCAP. The Action Plan has incorporated changes, as necessary, based on public comments. Staff has also incorporated the following changes to the Action Plan which were approved by the Commission at the June, 9, 1999 meeting:

1. revise Recommendation V-2 to include addressing hazards to blufftop development as well as beachfront development;
2. add a recommendation to address mitigation for fire abatement from private development which encroaches into public parkland;
3. encourage L.A. County to address impacts from building pad size through its LCP planning; and
4. recommend that the City of Malibu's and L.A. County's LCP include policies to address revegetation of disturbed land with the appropriate native species and criteria to monitor revegetation requirements.

This Action Plan as adopted will direct the implementation of the priority recommendations of the Santa Monica Mountains/Malibu ReCAP report and will be sent to local governments for their consideration in local coastal planning. A final ReCAP report will be published and will incorporate changes which the staff previously indicated would be made in responding to the numerous public comments following public hearings on the report.

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Santa Monica Mountains/Malibu ReCAP Action Plan

This Action Plan, adopted by the Commission on June 9, 1999, details a strategy for implementing the Santa Monica Mountains/Malibu ReCAP recommendations. **The action plan, which addresses all the recommendations in the Oct. 1998 draft report as revised by public comments and the Commission, is presented in three parts:**

Part 1: Recommendations for transmittal to local governments for assistance in their LCP planning and/or to consider modifications to an existing LCP. Part 1 is organized to present the specific recommendations of the preliminary report, grouped by issue and referenced by the number in the preliminary report, which should be carried out through Local Coastal Planning. The recommendations are followed by a summary of the ReCAP findings.

Part 2: Priority Action Items for Commission implementation as part of the Commission's existing regulatory or planning programs during the next 1-2 years. Each action item is followed by the specific ReCAP recommendations from the report which will be carried out as part of the action item. The specific recommendations are identified by the number in the preliminary ReCAP report. For each Priority Action Item, specific tasks necessary to implement the full range of recommendations and a suggested timeframe are identified. A summary of the relevant ReCAP findings follows the recommendations.

Part 3: Other ReCAP recommendations endorsed by the Commission but which will not be implemented until time and resources are available, preferably within five years. As resources become available, staff will propose revisions to this Action Plan to propose specific steps to carry out these other recommendations.

PART 1: Recommendations for transmittal to local governments.

Description: The following ReCAP recommendations require action on the part of local governments, involving either modifications to an existing LCP (Ventura County) or incorporation of the recommendation into an LCP currently under development (County of Los Angeles and/or City of Malibu).

Concentration and Location of Development

ReCAP Recommendations:

III-10 (a)	Adopt a TDC program which is implemented across jurisdictional lines in the Santa Monica Mountains, so as to ensure no net increase in the number of lots in the region as a whole. The program should be structured to incorporate the recommendations of the ReCAP report. If the City and County find that a TDC program cannot be structured across both jurisdictions, Los Angeles County should amend its LUP to include a TDC program within its jurisdiction to ensure no net increase in the number of lots in the area. The City of Malibu should also include in its proposed LCP a TDC program within its jurisdiction to ensure no net increase in the number of lots. (County of Los Angeles and City of Malibu)
III-10 (b)	Retain use of the slope-intensity formula as described in the 1986 LUP. (County of Los Angeles)
III-10 (c)	Include a slope intensity formula, where applicable, as part of the LCP. (City of Malibu)
III-11	Amend the LA County Santa Monica Mountains LUP to reduce the maximum building pad size, and implement the new standard throughout the coastal zone rather than only in the significant watersheds. Designation of the building pad size should account for brush clearance requirements and minimize the impacts associated with clearance activity. (County of Los Angeles) Include policies to address sedimentation and runoff into sensitive resources including use of best management practices. Policies should also ensure relandscaping disturbed areas, using appropriate native species, and include criteria to monitor revegetation. (County of Los Angeles and City of Malibu)
III-9 (b)	Develop and maintain a post-certification tracking system to track the location of approved development and required easements, and transmit information to Commission staff on a regular basis. (County of Los Angeles and City of Malibu)

III-4 (b)	Coordinate with National Park Service, California Department of Parks and Recreation, and the Santa Monica Mountains Conservancy to ensure the integrity of wildlife corridors and habitat linkages. Identification and mapping of habitat linkages should be included in the LCP along with measures to protect such areas, including potential designation as donor areas under a TDC program. (County of Los Angeles)
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The Commission also encourages the L.A. County and the City of Malibu to address the following issues in their respective LCPs: consider reducing the allowable density in the region; developing a maximum building pad size within the City of Malibu, similar to the above recommendation for L.A. County; and updating the County's circulation plan and coordinating development patterns to that plan.

Public Access

ReCAP Recommendations:

IV-1	Open El Sol Beach and Dan Blocker Beach. Coordinate with the L.A. County Department of Beaches and Harbors in achieving more access to these beaches. (County of Los Angeles)
IV-2 (b)	Include plans in the LCP for alternative locations for local park uses currently at Malibu Bluffs State Park and ensure that existing athletic fields at Malibu Bluffs State Park are not expanded or reconstructed. (City of Malibu)
IV-3	Work with the California Department of Parks and Recreation to improve access to Point Dume State Preserve by improving the availability of parking in the area adjacent to or within the blufftop portion of the Preserve. (City of Malibu)
IV-6	Develop a strategy in the LCP to utilize parking for office and commercial development near beach areas for public access parking in off-peak periods. (City of Malibu)
IV-10	Incorporate policies designed to minimize and mitigate impacts of development on public shoreline access, including policies to require access offers-to-dedicate (OTDs) to mitigate demonstrated impacts to public access. LCP policies should include details on a program to implement OTDs, including timing for developing each OTD, funding sources for construction of improvements and operation costs, and City department responsible for implementation. (City of Malibu)
IV-11	Improve and/or include permit review procedures to provide for obtaining State Land Commission review on the boundary between public tidelands and private property as a part of coastal permit filing requirements for new development along the shoreline. (Ventura County, County of Los Angeles, City of Malibu)

IV-15 (b)	Include measures, policies and standards to prevent unauthorized encroachment of development, and to remove non-permitted encroachments, on any area covered by a recorded and accepted inland trail easement. Include policies to require as part of permit procedures, the submittal of mapped documentation locating any recorded inland trail easement or recorded inland trail OTD easement in relation to a proposed development if such development may affect an existing or proposed easement. (County of Los Angeles and City of Malibu)
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The Commission also encourages the City of Malibu and County of Los Angeles to include in their LCP planning comprehensive recreation facilities and trail planning. This planning should identify and include measures to protect trail linkages between upland parks and public beaches.

Shoreline Armoring

ReCAP Recommendations:

V-1	Include policies in the LCP to prohibit development that would require armoring for those shoreline areas that do not constitute "infill". Prohibit new subdivisions, including lot splits, which create new lots within high wave hazard areas. (City of Malibu and Ventura County)
V-2 (b)	As a condition of new development or demolition and rebuilding of structures subject to coastal hazards (beach or bluff erosion, inundation, wave uprush, etc.), require new development on the beach or oceanfronting bluff be sited outside areas subject to coastal hazards or elevated above the Base Flood Elevation (as defined by FEMA) and set back as far landward as possible. If siting outside areas subject to coastal hazards is feasible but the applicant elects not to site development there, conditions of allowable developments should provide that the applicant assumes the risk of building in the hazardous areas without assurance that future armoring will be allowed. As part of reconstruction, policies should require investigation of alternatives for waste treatment, including the redesign and/or relocation of septic systems designed solely to protect such systems. (City of Malibu and Ventura County)
V-3 (b)	Include policies in LCP to ensure that new development and demolition/reconstruction of existing development be set back as far landward as possible from the most landward mean high tideline (MHTL), regardless of the location of protective devices on adjacent lots. The stringline for shoreline protective devices should be applied as a maximum extent of seaward development <i>only if</i> no further landward setback is possible. (City of Malibu)

V-4 (b)	Require submittal of documentation and maps locating any existing OTDs and dedicated easement areas in relation to the proposed development of any shoreline protective device or revetment as part of application filing. If such an OTD or dedicated easement is required as a condition of approval, the mapping should be completed prior to issuance of the permit. (City of Malibu and Ventura County)
V-7	Amend LCP to incorporate procedures for emergency permitting and for reconstruction of shoreline protective devices (SPDs), including modifications in Recommendations V-2 and V-3. (Ventura County)
V-9	Include policies in LCP to establish periodic sand nourishment of key beaches vulnerable to wave damage. Policies should be developed in consultation with the L.A. County Dept. of Beaches and Harbors and State Lands Commission. Policies and programs developed for beach nourishment should include measures to minimize adverse resource impacts from deposition of material, including measures such as timing or seasonal restrictions or identification of preferred locations for deposits. (County of Los Angeles and City of Malibu)
V-11	Include policies in LCP to require that sediment removed from catchment basins be tested for suitability and, if appropriate, used for disposal in the littoral system. (County of Los Angeles, Ventura County, and City of Malibu) In consultation with the L.A. County Dept. of Beaches and Harbors, designate appropriate beaches or offshore feeder sites in the littoral system for placement of suitable sand materials from catchment basins, consistent with Coastal Act Section 30233 (b) and (d). Policies and programs developed for beach nourishment should include measures to minimize adverse resource impacts including measures such as timing or seasonal restrictions or identification of preferred locations for deposits. (City of Malibu and Ventura County)

Summary of Findings: The ReCAP analysis of policy implementation in the Santa Monica Mountains involved three jurisdictions: the City of Malibu, the County of Los Angeles, and a portion of Ventura County. The analysis and recommendations for transmittal to the City of Malibu and the County of Los Angeles are intended to provide guidance to those local governments for their LCP planning. As described in the *Preliminary Draft Findings and Recommendation for the Santa Monica Mountains/Malibu Area ReCAP*, dated October, 1998, cumulative impacts to coastal resources have resulted from the amount and location of development.

The Coastal Act requires, in part, that new development be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. The Coastal Act also requires that the location and extent of new development maintain and enhance public access to the coast, and minimize impacts to shoreline resources.

If implemented, the recommendations of the ReCAP report will address those impacts and improve the management and protection of coastal resources, as required under California's coastal management program. Since the City of Malibu and the County of Los Angeles are both

in the process of developing a LCP for Commission approval, after which they will assume regulation of most coastal zone development, the findings and recommendations for the issues ReCAP identified are pertinent to transmit to the respective local governments.

Ventura County, however, has a certified LCP. Although the ReCAP analysis did not cover the entire county, the analysis of the implementation of the Ventura County LCP for this small part of the County can be transmitted pursuant to Coastal Act section 30519.5. This section mandates that the Commission periodically review the implementation of certified LCPs to determine if the LCP is being carried out in conformity with the policies of the Coastal Act.

During the public comment period on the ReCAP report, the following issues relating to the management of growth and development in the Santa Monica Mountains region were raised: 1) reducing the allowable density in the region; 2) developing a maximum building pad size within the City of Malibu; and 3) updating the County's circulation plan and coordinating development patterns to that plan. While ReCAP staff's analysis did not directly address these concerns, they are important issues in managing growth and development in the region. Therefore, staff encourages County and City staff to also address these issues as part of LCP planning.

The public comment period also raised the need to protect linkages between upland parks and public beaches. This comprehensive trail planning, and the provision of necessary support facilities, is an important part of LCP planning by both the City of Malibu and L.A. County.

PART 2. Priority Action Items for Commission Implementation

Description: Staff will carry out the following recommendations as resources permit. The Commission can begin implementation of these recommendations immediately through modifications to its current regulatory and planning programs. However, staff notes that carrying out recommendations resulting from the ReCAP review will add work tasks to programs that are already very limited in available staff resources. Some of the recommendations can be carried out using federal funds available through the CZMA Section 309 Enhancement Grants Program. In other cases staff is recommending that ReCAP action items be carried out by other agency programs, such as through the Access or Enforcement Programs. Given limited resources, competing demands and priorities will have to be weighed in pursuing these recommendations.

Action Item 1: Implement improvements to the TDC program through the CCC regulatory program to address cumulative impacts of the concentration and location of development.

ReCAP Recommendations:

III-1	Continue the use of the Transfer of Development Credit (TDC) program as structured across the City of Malibu and Los Angeles County, with the modifications proposed through Recommendations III-3 through III-13 until LCPs are certified for Los Angeles County and the City of Malibu in order to meet the objective of no net increase in parcels in the Santa Monica Mountains.
III-2	Continue use of the slope intensity formula/GSA program as a means to reduce the cumulative impacts of development in the small lot subdivisions.
III-3	Revise the approved donor areas for TDC retirement to exclude certain small lot subdivisions that are substantially built out and/or have had sufficient lot retirement to reduce density at buildout, and focus lot retirement under the TDC program in other areas. The small lot subdivisions proposed for removal as donor areas are: Malibu Mar Vista, Malibu Lake, Las Flores Heights, and El Nido. However, within these small lot subdivisions, TDC credits should be given where the lots to be retired are all adjacent to each other <i>and</i> contain sensitive habitat. Continue to use the slope intensity formula/GSA in <i>all</i> small lot subdivisions to further reduce densities and prevent cumulative impacts.
III-4 (a)	Revise approved donor areas for TDC retirement to include parcels in wildlife corridors and parcels adjacent to parkland where development could not be sited to avoid fire abatement requirements encroaching into public parkland. Propose revisions to the Commission to expand the approved donor areas as information identifying critical habitat linkages is developed by the National Park Service (NPS) or through the LCP planning process.

III-5	Where TDC credit is given for lots in small lot subdivisions, the value of a TDC should be based solely on the acreage (i.e., size and slope) and the existence of services to the lot (i.e., proximity of roads and water), as described in the 1981 District Interpretive Guidelines. Additional TDC value should not be given for the presence of sensitive habitat on lots within the small lot subdivisions.
III-8 (c)	Revise TDC process to prohibit future use of in-lieu fee transactions.

Tasks	Schedule
1.1 Revise staff procedures for qualifying TDCs in conjunction with applicable coastal permits.	FY 98/99
1.2 Distribute revised procedures to district permit staff and provide training in qualifying future TDCs, based on the revised procedures.	FY 99/00

Summary of Findings: As found in the Santa Monica Mountains/Malibu Area ReCAP report, the cumulative impacts of development in the Santa Monica Mountains has long been a concern. Mitigation measures imposed by the Commission to reduce the impacts resulting from the amount and location of development through the use of Transfer of Development Credits (TDCs) and the slope intensity formula have been vital tools in addressing cumulative impacts in the region. The ReCAP report assessed the effectiveness of the TDC program and identified the above modifications that, if implemented, would assure its continued effectiveness in the future and ensure better protection of coastal resources. Some comments were made to retain the El Nido and Malibu Lake small lot subdivisions as donor areas. As noted in the response to comments, TDC requirements have significantly reduced cumulative impacts in these subdivisions and implementation of this ReCAP recommendation will focus mitigation on areas where greater mitigation of cumulative impacts can be achieved. In addition, at a minimum, parcels within previously identified wildlife corridors should be included as donor areas. As more specific mapping of needed habitat linkages is completed through the LCP or other planning efforts, further revisions may be suggested.

Action Item 2: Pursue changes in TDC process through interagency coordination.

ReCAP Recommendations:

III-6 (a)	Work with L.A. County to ensure that lots retired under the TDC and GSA programs are actually recombined into one parcel (for example, through an expedited reversion to acreage process).
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III-7 (a)	Explore options for developing an MOU with appropriate agencies, including L.A. County, the Coastal Conservancy, the Santa Monica Mountains Conservancy, and/or other non-governmental organizations to accelerate acceptance of existing OTDs and future dedications of open space easements for TDCs. The MOU should designate one or more of the agencies as an ongoing "accepting managing entity".
III-8 (d)	Maintain and update Geographic Information System (GIS) data layers for the TDC and GSA programs which were developed as part of ReCAP.

Tasks	Schedule
2.1 Identify high priority TDC OTDs that are due to expire soon.	FY 98/99
2.2 Identify potential agencies for accepting OTDs and set up meetings to identify their concerns. (III-7)	FY 98/99
2.3 Based on responses, follow up research to resolve identified obstacles to accepting OTDs, including issues related to fire abatement. (III-7)	FY 99/00
2.4 If one or more agency (ies) is willing to accept existing OTDs, work with agencies to complete transaction. (III-7)	FY 99/00 and FY 00/01
2.5 With legal staff and L.A. County staff, research feasibility of establishing reversion to acreage or other lot merger process. (III-6)	FY 98/99
2.6 Conduct meeting(s) with L.A. County Assessor's office to identify and discuss potential barriers to establishing reversion to acreage process or other lot merger process. (III-6)	FY 99/00 and FY 00/01
2.7 Research options to encourage acceptance of future OTDs and, if appropriate, draft revised language for special conditions.	FY 99/00 and FY 00/01
2.8 Complete data entry for TDC/GSA transactions post-ReCAP. (III-8)	FY 99/00
2.9 With the Commission's information systems staff, technical services staff, and legal staff, develop process for keeping TDC/GSA data layers updated. (III-8)	FY 99/00
2.10 Transfer TDC/GSA database and GIS layers to appropriate Commission and local government staff. (III-8).	FY 99/00

Summary of Findings: As documented in the Preliminary ReCAP report, the mitigation required through Offers to Dedicate (OTDs) that are recorded against the title of permit applicant's property is not fully implemented unless the OTDs are accepted by a managing entity and the lands protected from future development. The ReCAP report found that the successful protection of lands retired through the TDC program requires continuing coordination with local governments. As local government assume permitting authority following certification, this coordination becomes even more important. In addition to the modifications detailed in Action Item 1, the ReCAP analysis identified a number of measures to ensure that the TDC implementation is effectively carried and interagency coordination improved, especially through the use of improved information exchange. Identification, mapping and acceptance of the priority OTDs which are due to expire in the next few years is also a main objective of this action item.

Action Item 3: Ensure maximum protection of public access to the coast.

ReCAP Recommendations:

IV-5	In consultation with State Lands Commission, identify and seek removal of all unauthorized physical development that encroaches into state tidelands areas.
IV-7	Inventory existing available public parking along Pacific Coast Highway and public roads seaward of PCH to establish baseline data to prevent future loss of shoreline access through unpermitted signage or construction of physical barriers.
IV-8	Commission staff should continue to coordinate with the Coastal Conservancy, local governments, and other public agencies or non-profit organizations to accept all existing vertical and lateral OTDs to ensure that no offers expire and to develop, as necessary, and open accepted easements to public use. The Commission and Coastal Conservancy should also provide funding where feasible (such as from the Malibu Beach Access Fund, the permit fee fund, the violation remediation fund, and other sources) to public agencies or non-profit organizations for the development, operation, and maintenance of public accessways.
IV-14	Recommend the following as top priority tasks for the Commission Statewide Access Program: 1) map the location of the 8 accepted and 80 recorded inland trail OTD easements, with priority to those due to expire by 2004; 2) coordinate with local governments as part of LCP planning to rank the 80 recorded inland trail OTD easements in priority for acceptance; 3) assist local government and other agencies to accept and open for public use high-priority recorded inland trail OTD easements.

Tasks	Schedule
3.1 In cooperation with the Access Program identify priority OTDs set to expire in the next four years.	FY 98/99
3.2 Complete mapping of the highest priority OTDs.	FY 99/00
3.3 Identify potential agencies for accepting OTDs and set up meetings to identify concerns and develop strategy.	FY 99/00
3.4 Set up initial coordination meeting with State Lands Commission and others; develop plan to identify encroachments on state land and strategy for removal. (IV-5)	FY 00/01
3.5 Conduct file review and field checks to identify areas with encroachments. (IV-5)	FY 00/01
3.6 Submit encroachment information to Enforcement Unit for possible action to seek removal. (IV-5)	FY 00/01
3.7 Coordinate with Commission's LCP grant program; condition grants to require recipient to provide parking data; Provide assistance to local governments to design methodology for parking inventory and data to be collected (IV-7)	FY 99/00
3.8 For parking inventories not funded under LCP grants, undertake field analysis and aerial photo analysis to identify current public parking inventory. (IV-7)	FY 00/01
3.9 Compile local parking data and Commission parking data to develop parking inventory in GIS. (IV-7)	FY 00/01

Summary of Findings: The Coastal Act requires that the Commission and local governments, through their LCPs, protect and enhance opportunities for public access to the coast. The ReCAP report documented that the cumulative loss of public access opportunities has been significant in the Santa Monica Mountains/Malibu area. The scarcity of beach parking has led to conflicts between visitors and local residents. Public access needs could be addressed by increasing the supply of beach parking and by protecting the existing supply.

As noted in the ReCAP report, accepting outstanding OTDs that would provide new shoreline access opportunities is a high priority for the Commission's Access Program. The Access Program has developed information on the shoreline OTDs and their potential expiration dates statewide and is completing mapping of the vertical accessways in Malibu. Efforts of these tasks will focus on acceptance of the highest priority access OTDs. In addition, the Commission conditioned the recent award of a LCP planning grant to LA County on developing a strategy to accept outstanding Access OTDs as part of their Access Component. These tasks will focus on the OTDs likely to expire before LCP planning is completed and will provide technical assistance to the local governments. ReCAP found that encroachments presented an obstacle to facilitating OTD acceptance and tasks are proposed to address this issue.

Action Item 4: Ensure protection of public easement areas.

ReCAP Recommendations:

III-12; IV-9 (b); IV-15 (a); V-4 (a)	Modify Commission permit procedures to require permit applicants to submit, prior to issuance of the permit, mapped documentation locating any existing, proposed or required OTDs or dedicated easements on the applicant's property that may be affected by the proposed development. For proposed or required public access easements, mapping should be done on air photos and project plans.
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Tasks	Schedule
4.1 Modify condition compliance forms and/or draft new special condition language for OTDs and review with legal staff and mapping staff.	FY 98/99
4.2 Finalize language in staff procedural memo.	FY 98/99

Summary of Findings: One of the primary tools that the Commission has used to protect shoreline and trail access opportunities and sensitive habitats is the use of easement areas and offers to dedicate (OTD) easements. The Santa Monica Mountains/Malibu Area ReCAP report documented that a lack of spatial information on the easements has hindered acceptance by land management entities of outstanding OTDs. While the Commission will need to complete mapping of OTDs for permits already issued in order to facilitate acceptance, future permit conditions to require mitigation through an offer to dedicate an easement should include mapping of the easement area as part of the condition compliance.

Action Item 5: Increase protection of shoreline resources from impacts caused by armoring.

ReCAP Recommendations:

V-2 (a)	The Commission should, as a condition of new development or of demolition and rebuilding of structures subject to coastal hazards (beach or bluff erosion, inundation, wave uprush, etc.), require that new development on the beach or oceanfronting bluff be sited outside areas subject to hazards or elevated above the Base Flood Elevation (as defined by FEMA), and set back as far landward as possible. If siting outside areas subject to coastal hazards is feasible but the applicant elects not to site development there, conditions of allowable developments should provide that the applicant assumes the risk of building in the hazardous areas without assurance that future armoring will be allowed. As part of reconstruction, require investigation of alternatives for waste treatment, including the redesign and/or relocation of sewage disposal systems to avoid the need for bulkheads or retaining walls designed solely to protect such systems.
V-3 (a)	Require in the review of coastal development permits for new development and for demolition and reconstruction of existing development, any permitted shoreline structures be set back as far landward as possible from the most landward mean high tideline (MHTL), regardless of the location of protective devices on adjacent lots. The stringline for shoreline protective devices should be applied as a maximum extent of seaward development <i>only if</i> no further landward setback is possible.
V-6 (a)	Pursue modification of Section 30600 (e) of the Coastal Act to require a follow up coastal development permit for emergency actions undertaken to protect public roads which result in placement of new or expanded shoreline armoring.

Tasks	Schedule
5.1 Draft staff procedures for review of permit applications for development on the shoreline or revise special condition language; (V-2; V-3)	FY 00/01
5.2 Draft suggested revisions to Section 30600 (e) of Coastal Act for Commission consideration. (V-6)	FY 98/99 and FY 99/00

Summary of Findings: As discussed in the ReCAP findings, the cumulative effects of development of structures, including shoreline armoring on sandy beaches, has resulted in the loss of public resources on sandy beaches, including loss of recreational area. Many of the

impacts were a result of placement of armoring during emergency conditions, which often prevents adequate consideration by the Commission of alternative engineering designs or siting of the armoring. The Santa Monica Mountains/Malibu Area ReCAP report identified recommendations to minimize impacts from emergency armoring and to encourage consideration of alternatives. In addition, recommendations address measures to discourage further seaward encroachment of new development which could result in additional armoring.

PART 3. Other ReCAP Recommendations for Future Implementation Dependent on Additional Resources and/or Actions by other Agencies

Description: These recommendations may require additional resources and/or a longer time frame for implementation than those contained in Part 2. In many cases, these recommendations will require collaboration with other agencies. Clearly, the Commission lacks sufficient resources to undertake all of these efforts at the present time. For some of these recommendations, staff proposes to begin implementation now, while recognizing that complete implementation may take several years. Staff may begin collaboration with other affected agencies and may also pursue additional funding where necessary to begin the process of implementation. These recommendations are not part of the priority Action Items for immediate implementation, and staff has not included specific task lists for the recommendations. Instead, as part of future implementation, staff will bring revisions to the Action Plan back to the Commission.

Ensure mitigation is carried out by improving the Commission's permit and condition compliance procedures.

ReCAP Recommendations:

III-8 (a)	Improve the tracking and monitoring of all prior to issuance conditions, including TDC and GSA mitigation, by modifying the Commission's existing statewide permit tracking system to include a condition compliance component.
III-13	The Commission should develop procedures to ensure adequate mitigation where required brush clearance encroaches into existing public parkland. Measures could include off-site habitat enhancement/restoration and/or use of in-lieu fees for habitat restoration. Whenever possible, the development should be sited to avoid fire clearance encroaching into parklands.

Summary of Findings: Monitoring existing TDC requirements as future permit applications are reviewed is important to protect any existing easements or offers to dedicate easements. Currently there is no easy way for Commission staff analysts to be alerted through the permit tracking system of the existence of TDC conditions on past permits. In addition, the ReCAP report noted several cases where a permit was issued prior to completion of TDC conditions, contrary to the intent of the permit condition. Although the number of such cases was small, modification of the existing tracking procedures will help ensure that required conditions are met prior to a permit being issued.

The Commission's experience has also shown that fire abatement requirements can lead to significant impacts on public parklands which may not be mitigated. Developing procedures to ensure adequate mitigation will better protect existing park areas.

Expand interagency coordination and activities to address the cumulative impact of development on coastal resources.

ReCAP Recommendations:

III-6 (b)	Once a program is developed with L.A. County to ensure that lots retired under the TDC and GSA program are actually recombined into one parcel (for example, through an expedited reversion to acreage process, the Commission should update its special condition language to require that, prior-to-issuance of the permit, any necessary TDC transactions be completed through this reversion to acreage process.
III-7 (b); IV-13	Explore option for developing an MOU with appropriate agencies to designate a principal management agency to directly accept future TDC OTDs and inland trail easement dedications. If an MOU is developed designating an accepting managing entity for trail easements and/or OTDs under the TDC program, the Commission should revise its special condition language to provide that when an open space easement is required as part of a TDC transaction, the easement be dedicated directly to the accepting entity. This strategy should include a monitoring program to track whether OTDs are accepted.
III-8 (b)	Encourage the Mountains Restoration Trust to complete existing in-lieu fee TDC transactions, as required by the terms of the transactions.
III-9 (a)	Develop a system to ensure that the local governments' planning departments receive updated TDC/GSA mapped information (GIS data layers) showing the location of restricted lots.
IV-1	Work with Los Angeles County's Beaches and Harbors Department to open currently undeveloped El Sol and Dan Blocker Beaches.
IV-2 (a)	Work with the California Department of Parks and Recreation to develop and submit for certification a public works plan for Malibu Bluffs State Park that provides for regional/state park uses.
IV-3	The California Department of Parks and Recreation and the City of Malibu should improve access to Point Dume State Preserve by improving the availability of public parking in the area adjacent to or within the blufftop portion of the Preserve.
V-10	The state Department of Transportation should assist the L.A. County Beach Nourishment Task Force in investigating measures to fund regional beach sand nourishment and to address the use of clean material for placement on the beach. Beach sand nourishment proposals should also be coordinated with the LA County Beaches and Harbors Department and the State Lands Commission. Policies and programs developed for beach nourishment should include measures to minimize adverse resource impacts from deposition of material, including measures such as timing or seasonal restrictions or identification of preferred locations for deposits.

Summary of Findings: As identified through the ReCAP report, assuring that Commission-required coastal permit mitigation of impacts to coastal resources is fully complete in some cases relies in part on actions by other agencies, including local governments and/or other governmental agencies such as the state Department of Parks and Recreation. While implementing solutions may require direct action by other governmental agencies, by focusing additional Commission resources, as they are available, on technical assistance and coordination, the Commission could help to encourage other agencies to take needed action to help address the cumulative impacts of development to coastal resources.

Mitigate cumulative impacts to public access through expansion of the Commission's Access Program efforts.

ReCAP Recommendations:

IV-4	Work with local governments, the State Coastal Conservancy, the California Department of Parks and Recreation, the Santa Monica Mountains Conservancy, and Caltrans to develop a comprehensive signage program to better identify public use opportunities and minimize conflicts between public and private use.
IV-12	Develop and publish a regional public access guide for the Malibu area.
IV-16	Support the appropriation of public funds for the purchase of parcels and/or easements to close existing gaps in the public trail system in the Santa Monica Mountains.

Summary of Findings: The ReCAP report identified a number of opportunities to enhance public access opportunities in the Santa Monica Mountains/Malibu region which cannot be achieved solely through the regulatory program. The report noted that additional resources should be provided to the Commission's Access Program to carry out alternative mechanisms to maximize public access and minimize cumulative impacts through acceptance and opening of accessways, signing, public information and other non-regulatory actions. The Access Program, if provided additional resources, could provide significant assistance to help maximize public access to the shoreline and through the mountains.

Improve public access through Commission enforcement activities in the region.

ReCAP Recommendations:

IV-9 (a)	The Commission should enforce the terms of recorded and accepted access and trail OTDs and deed restrictions, including requiring removal of encroachments unauthorized by the terms of the accepted easement. Investigate specific cases of encroachment into recorded but unaccepted OTD easement areas and take steps to remove and/or reduce encroachments as allowable and feasible.
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Summary of Findings: The ReCAP report identified physical encroachments from shoreline development into public access easement areas and state tidelands as a cumulative impact to coastal access and recreation resources. Similar to the impacts identified from encroachments into shorefront easements, encroachments into inland trail easements could also result in significant impacts to coastal access. In order to protect access, each OTD must be researched for uses allowed under the terms of the recorded and accepted offer and information submitted to the Commission's enforcement program for possible action. Since this process for inland OTDs will require more extensive resources than are now available, it is proposed for later action as resources become available. In addition, additional legal research is needed into the ability of the Commission to remove encroachments from OTD areas which have been recorded but not yet accepted.

Recommend legislative changes to address cumulative impacts.

ReCAP Recommendations:

V-5	Investigate incentives for relocating of development in hazardous shoreline areas. Consider modifications to Section 30610 of the Coastal Act to require a full permit application for the rebuilding of property damaged or destroyed by ocean waves or erosion even if reconstruction occurs in the same location and footprint as the damaged structure.
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Summary of Findings: The ReCAP report documented the effects of shoreline armoring rebuilt as a result of coastal permit exemptions. Under current Coastal Act exemptions, certain structures located in hazardous areas under certain criteria can continue to be rebuilt without full permit review which would consider other alternatives such as relocation of structures to avoid the need for the shoreline protective device. This perpetuates the likelihood of additional and

continued shoreline armoring to protect those structures. Incentives should be pursued to locate development destroyed by a natural disaster out of hazardous areas.

Improve the Commission's management of shoreline resources

ReCAP Recommendations:

V-6 (b)	Develop modified emergency permit procedures to require that where emergency actions by Caltrans are required and are not exempt pursuant to PRC 30600(e), permits require Caltrans to use the least environmentally damaging engineering alternative in responding to emergencies to protect Pacific Coast Highway. If the least environmentally damaging engineering alternative can not be installed during the emergency response, all reasonable efforts shall be made to install engineering alternatives that can later be replaced by the least environmentally damaging engineering alternative.
V-8	Establish procedures for Commission and local governments for coordination with property owners for field inspections before and after storm seasons. Procedures should: provide advance information on location of easement areas to assure emergency structures are not occupying public easements; provide for inspections to identify shoreline protective structures built without permits; and, assure emergency structures are removed or regular permit follow-up is completed within the 60 day period.
V-12	The Commission should develop a long-term strategy to address the issue of sea level rise. The strategy should define the criteria for estimated sea level rise (i.e., projections of sea level rise from EPA) and should develop measures to avoid or to minimize the effects of sea level rise in permit actions and in Local Coastal Programs. Such measures could include modifying Commission permit requirements to: 1) require that the potential for sea level rise is considered in the design of all development proposals and habitat restoration projects along the ocean shoreline and the shoreline immediately adjacent to or within a harbor, river, bay, or estuary; and 2) require that buffer areas adequate to address sea level rise are included in wetland restoration projects.

Summary of Findings: The ReCAP report identified the cumulative adverse impacts to shoreline resources and public access from the placement of shoreline armoring in response to storms and erosion. However, projected sea level rise will result in even greater exposure of shorefront development to threats from erosion and thus increased demand for shoreline protective devices. Before modifications to the Commission's regulatory program can be made and before guidance can be developed for incorporation of policies into LCPs, more study needs to be completed on the implications of sea level rise to the shoreline development in the area. As resources permit, the Commission should initiate these efforts.

The ReCAP report identified the cumulative effects resulting from the placement of armoring during emergencies. Implementation of recommendation V-8 will result in improved monitoring procedures to respond to future emergencies in order to minimize future emergency armoring.

Improve the Commission's use of open space easements.

During the public comment period, Commission staff received a comment that the Commission should modify the uses allowed in open space OTDs. Although ReCAP staff looked at the issue of open space easements under the TDC program, staff could not undertake a full analysis of uses allowed in open space easements. Under the TDC program, a wide range of uses are allowed in some cases; other cases significantly restrict what development can be placed in an open space easements. ReCAP staff agrees that this issue should be addressed and guidance developed. As resources are available, staff will undertake this analysis and develop guidance for permit conditions.

ReCAP Recommendations

Concentration and Location of Development

- III-1:** The Commission should continue use of the TDC program, as structured across the City of Malibu and Los Angeles County, with the modifications proposed through Recommendations III-3 through III-13, until Local Coastal Programs are certified for Los Angeles County and the City of Malibu in order to meet the objective of no net increase in parcels in the Santa Monica Mountains region.
- III-2:** The Commission should continue use of the slope intensity formula/GSA program as an effective means to reduce the cumulative impacts of development in the small lot subdivisions.
- III-3:** Revise the approved donor areas for TDC retirement to exclude certain small lot subdivisions that are substantially built out and/or have had sufficient lot retirement to reduce density at buildout, and focus lot retirement under the TDC program in other areas. The small lot subdivisions proposed for removal as donor areas are: Malibu Mar Vista, Malibu Lake, Las Flores Heights, and El Nido. However, within these small lot subdivisions, TDC credits should be given where the lots to be retired are all adjacent to each other *and* contain sensitive habitat. Continue to use the slope intensity formula/GSA in *all* small lot subdivisions to further reduce densities and prevent cumulative impacts.
- III-4:** (a) Revise the approved donor areas for TDC retirement to include parcels in wildlife corridors and parcels adjacent to parkland where development could not be sited to avoid fire abatement requirements encroaching into public parkland. Propose revisions to the Commission to expand the approved donor areas as information identifying critical habitat linkages is developed by the National Park Service or through the LCP planning process.
- (b) The County of Los Angeles should coordinate with the National Park Service, California Department of Parks and Recreation, and the Santa Monica Mountains Conservancy to ensure the integrity of wildlife corridors and habitat linkages. Identification and mapping of habitat linkages should be included in the LCP along with measures to protect such areas, including potential designation as donor areas under a TDC program.
- III-5:** Where TDC credit is given for lots in small lot subdivisions, the value of a TDC should be based solely on the acreage (i.e., size and slope) and the existence of services to the lot (i.e., proximity of roads and water), as described in the 1981 District Interpretive Guidelines. Additional TDC value should not be given for the presence of sensitive habitat on lots within the small lot subdivisions.
- III-6:** (a) Work with L.A. County to ensure that lots retired under the TDC and GSA program are actually recombined into one parcel (for example, through an expedited reversion to acreage process).
- (b) Once a program is developed with L.A. County, the Commission should update its special condition language to require that, prior-to-issuance of the permit, any necessary TDC transactions be completed through the lot recombination stage.
- III-7:** (a) Explore options for developing a Memorandum of Understanding (MOU) with appropriate agencies, including Los Angeles County, the Coastal Conservancy, the Santa Monica Mountains Conservancy, and/or other non-governmental organizations to accelerate acceptance of existing OTDs and future dedications of open space easements for TDCs. The MOU should also designate one or more of the agencies as an on-going "accepting managing entity".
- (b) If an MOU is developed designating an entity as an accepting managing entity, the Commission should revise its special condition language to provide that when an open space easement is required, the easement be dedicated directly to the accepting entity. This strategy should include a monitoring program to track whether offers-to-dedicate are accepted.
- III-8:** Improve the tracking and monitoring of all prior to issuance conditions, including TDC and GSA mitigation, by (a) modifying the statewide permit tracking system to include a condition compliance component; (b) encouraging the Mountains Restoration Trust to complete existing in-lieu fee TDC transactions; (c) prohibiting the use of in-lieu fees for future transactions; and (d) maintaining and updating the Geographic Information System (GIS) layers for the TDC and GSA programs which were developed as part of ReCAP.

ReCAP Recommendations (cont'd)

- III-9:** (a) Develop a system to ensure that the local governments' planning department receives updated TDC/GSA layers showing the location of the restricted lots.
- (b) The City of Malibu and the County of Los Angeles, as part of their LCP planning, should develop and maintain a post-certification tracking system to track the location of approved development and required easements, and should transmit such information to Commission staff on a regular basis.
- III-10:** (a) The City of Malibu and the County of Los Angeles should adopt a TDC program which is implemented across jurisdictional lines in the Santa Monica Mountains, so as to ensure no net increase in the number of lots in the region as a whole. The program should be structured to incorporate the recommendations of the ReCAP report. If the City and County find that a TDC program cannot be structured across both jurisdictions, Los Angeles County should amend its LUP to include a TDC program within its jurisdiction to ensure no net increase in the number of lots in the area. The City of Malibu should also include in its proposed LCP a TDC program within its jurisdiction to ensure no net increase in the number of lots.
- (b) Los Angeles County should retain use of a slope intensity formula as described in the 1986 LUP.
- (c) The City of Malibu should include a slope intensity formula where applicable as part of its LCP planning.
- III-11:** The County of Los Angeles should amend the Los Angeles County Santa Monica Mountains LUP to reduce the maximum building pad size, and implement the new standard throughout the coastal zone, rather than only in the significant watersheds. Designation of the building pad size should account for brush clearance requirements and minimize the impacts associated with clearance activity. In addition, the County of Los Angeles and the City of Malibu should include in their LCPs policies to address sedimentation and runoff into sensitive resources including use of best management practices. Policies should also ensure relandscaping disturbed areas, using appropriate native species, and include criteria to monitor revegetation.

- III-12:** The Commission should modify its permit procedures for subdivisions to include the submission of maps locating any existing or proposed OTD, dedicated easement, or trail easement on the subject property.
- III-13:** The Commission should develop procedures to ensure adequate mitigation where required brush clearance encroaches into existing public parkland. Measures could include off-site habitat enhancement/restoration and/or use of in-lieu fees for habitat restoration. Whenever possible, the development should be sited to avoid fire clearance encroaching into parklands.

Public Access

- IV-1:** Los Angeles County should open El Sol Beach and Dan Blocker Beach. Coordinate with the L.A. County Department of Beaches and Harbors in achieving more access to these beaches.
- IV-2:** (a) The California Department of Parks and Recreation should develop and submit for certification a public works plan for Malibu Bluffs State Park that provides for regional/state park uses.
- (b) The City of Malibu LCP should include plans for alternative locations for local park uses in Malibu Bluffs State Park. No expansion or reconstruction of athletic fields should be permitted.
- IV-3:** The California Department of Parks and Recreation and the City of Malibu should improve access to Point Dume State Preserve by improving the availability of parking in the area adjacent to or within the blufftop portion of the Preserve.
- IV-4:** The Commission, the State Coastal Conservancy, the local governments, the California Department of Parks and Recreation, the Santa Monica Mountains Conservancy, and Caltrans should work together to develop a comprehensive signage program to better identify public use opportunities and minimize conflicts between public and private use.
- IV-5:** In consultation with the State Lands Commission, identify and seek removal of all unauthorized physical development that encroaches into state tidelands areas.

ReCAP Recommendations (cont'd)

- IV-6:** The City of Malibu should develop a strategy in its LCP to utilize parking for office and commercial development near beach areas for public access parking in off-peak periods.
- IV-7:** The Commission should inventory existing available parking along Pacific Coast Highway and public roads seaward of Pacific Coast Highway to establish baseline data to prevent future loss of access through unpermitted signage or construction of physical barriers.
- IV-8:** Commission staff should continue to coordinate with the Coastal Conservancy, local governments, and other public agencies or non-profit organizations to accept all existing vertical and lateral OTDs to ensure that no offers expire and to develop, as necessary, and open accepted access easements. The Commission and the Coastal Conservancy should also provide funding where feasible (e.g., from the Malibu Beach Access Fund, permit fee fund, violation remediation fund, and other sources) to public agencies or non-profit organizations for the development, operation and maintenance of accessways.
- IV-9:** (a) The Commission should enforce terms of recorded and accepted access and trail OTDs and deed restrictions, including requiring removal of encroachments unauthorized by the terms of the accepted easement. Investigate specific cases of encroachment into recorded but unaccepted OTD easement areas and take steps to remove and/or reduce encroachments as allowable and feasible.
- (b) The Commission should improve its access mitigation condition compliance by including as part of any access condition or as part of permit procedures the requirement that applicants map the location of existing and proposed easements or OTDs air photos and project plans. Where access is proposed as part of the submitted project, filing requirements should include such mapping.
- IV-10:** As part of its LCP planning, the City of Malibu should incorporate policies designed to minimize and mitigate impacts of development on public shoreline access, including policies to require access offers-to-dedicate (OTDs) to mitigate demonstrated impacts to public access. The LCP policies should include details on a program to implement OTDs, including timing for developing each OTD, funding sources for construction of improvements and operation costs, and City departments responsible for implementation.
- IV-11:** The County of Ventura should improve its permit review procedures to provide for obtaining State Lands Commission review on the boundary between public tidelands and private property as a part of coastal permit filing requirements for new development along the shoreline. The County of Los Angeles and the City of Malibu should include such a requirement in their LCP planning process.
- IV-12:** Develop and publish a regional access guide for the Malibu area.
- IV-13:** Pursue development of a Memorandum of Understanding to designate a principal management agency to directly accept future inland trail easement dedications, thereby eliminating the need for an offer-to-dedicate (OTD), when a public trail easement dedication is an element of a coastal development permit application. Once the MOU is achieved, revise the Commission's special condition language to require dedication of a trail easement directly to the principal management agency designated in the MOU, rather than requiring an OTD.
- IV-14:** The Commission should recommend the following as priority tasks for the Statewide Access Program: (1) map the location of the eight accepted and 80 recorded inland trail OTD easements, with priority to those due to expire by 2004; (2) coordinate with local governments as part of LCP planning to rank the 80 recorded inland trail OTD easements in priority for acceptance by qualified public agencies and private organizations; and (3) assist those agencies and organizations to accept and open for public use high-priority recorded inland trail OTD easements.
- IV-15:** (a) Modify Commission permit filing requirements to include the submittal of mapped documentation locating any recorded inland trail easements or recorded inland trail OTD easement in relation to a proposed development if such development may affect an existing or proposed easement.
- (b) Require LCP planning in the County of Los Angeles and City of Malibu to include similar measures and other policies and standards to prevent unauthorized encroachment of development,

ReCAP Recommendations (cont'd)

and to remove non-permitted encroachments, on any area covered by a recorded and accepted inland trail easement.

- IV-16:** Support the appropriation of public funds for the purchase of parcels and/or easements to close existing gaps in the public trail system in the Santa Monica Mountains.

Shoreline Armoring

- V-1:** The City of Malibu, as part of its LCP planning, should prohibit development that would require armoring for those shoreline areas which do not constitute "infill" and should prohibit new subdivisions, including lot splits, which create new lots within high wave hazard areas. The Ventura County LCP should be amended to incorporate similar restrictions.
- V-2:** (a) The Commission should, as a condition of new development or demolition and rebuilding of structures subject to coastal hazards (beach or bluff erosion, inundation, wave uprush, etc.), require that new development on the beach or oceanfront bluff be sited outside areas subject to hazards or elevated above the Base Flood Elevation (as defined by FEMA) and set back as far landward as possible. If siting outside areas subject to coastal hazards is feasible but the applicant elects not to site development there, conditions of allowable developments should provide that the applicant assumes the risk of building in the hazardous areas without assurance that future armoring will be allowed. As part of reconstruction, require investigation of alternatives for waste treatment, including the redesign and/or relocation of sewage disposal systems to avoid the need for bulkheads or retaining walls designed solely to protect such systems.
- (b) Similar requirements should be incorporated as part of LCPs for the City of Malibu and Ventura County.
- V-3:** (a) Require in the review of coastal development permits for new development and for demolition and reconstruction of existing development, any permitted shoreline structures be set back as far landward as possible from the most landward mean high tideline (MHTL), regardless of the location of protective devices on adjacent lots. The stringline for shoreline protective devices

should be applied as a maximum extent of seaward development *only if* no further landward setback is possible.

(b) Similar requirements should be incorporated into the LCP planning for the City of Malibu.

- V-4:** (a) Require the submittal of documentation and maps locating any existing OTDs and dedicated easement areas in relation to the proposed development of any shoreline protective device or revetment as part of application filing. If such an OTD or dedicated easement is required as a condition of approval, the mapping should be completed prior to issuance of the permit.
- (b) The City of Malibu and Ventura County should include similar measures in their LCP planning.
- V-5:** Investigate incentives for relocation of development in hazardous shoreline areas. Consider modification of Section 30610 of the Coastal Act to require a full permit application for the rebuilding of property damaged or destroyed by ocean waves or erosion even if reconstruction occurs in the same location and footprint as the damaged structure.
- V-6:** (a) Pursue modifications of Section 30600 (e) of the Coastal Act to require a follow up coastal development permit for emergency actions undertaken to protect public roads which result in placement of new or expanded shoreline armoring.
- (b) Develop modified emergency permit procedures to require that where emergency actions by Caltrans are required and are not exempt pursuant to PCR 30600(e), permits require Caltrans to use the least environmentally damaging engineering alternative in responding to emergencies to protect Pacific Coast Highway. If the least environmentally damaging engineering alternative can not be installed during the emergency response, all reasonable efforts shall be made to install engineering alternatives that can later be replaced by the least environmentally damaging engineering alternative.
- V-7:** The Ventura County LCP should be amended to incorporate procedures for emergency permitting and for reconstruction of SPDs, including modifications in Recommendations V-2 and V-3.

ReCAP Recommendations (cont'd)

- V-8:** Establish procedures for Commission and local governments for coordination with property owner for field inspections before and after storm seasons. Procedures should: provide advance information on location of easement areas to assure emergency structures are not occupying public easements; provide for inspections to identify shoreline protective structures built without permits; and assure emergency structures are removed or regular permit follow-up is completed within the 60 day period.
- V-9:** LCP Planning for the City of Malibu and Los Angeles County should include policies to establish periodic sand nourishment of key beaches vulnerable to wave damage. Policies should be developed in consultation with L.A. County Beaches and Harbor and the State Lands Commission. Policies and programs developed for beach nourishment should include measures to minimize adverse resource impacts from deposition of material, including measures such as timing or seasonal restrictions or identification of preferred locations for deposits.
- V-10:** The state Department of Transportation (Caltrans) should assist the LA County Beach Nourishment Task Force in investigating measures to fund regional beach sand nourishment and to address the use of clean material for placement on the beach. Beach sand nourishment proposals should also be coordinated with the LA County Beaches and Harbors Department and State Lands Commission. Policies and programs developed for beach nourishment should include measures to minimize adverse resource impacts from deposition of material, including measures such as timing or seasonal restrictions or identification of preferred locations for deposits.
- V-11:** The City of Malibu and Los Angeles County should include policies in their LCP planning to require that sediment removed from catchment basins be tested for suitability, and, if appropriate, used for disposal in the littoral system. In consultation with Los Angeles County Department of Beaches and Harbors, the LCP for Malibu should designate appropriate beaches or offshore feeder sites in the littoral system for placement of suitable materials from the catchment basins, consistent with Coastal Act Sections 30233 (b) and (d). The Ventura County LCP should be amended to include similar policies. Policies and programs developed for beach nourishment should include measures to minimize adverse resource impacts from deposition of material, including measures such as timing or seasonal restrictions or identification of preferred locations for deposits.
- V-12:** The Commission should develop a long-term strategy to address the issue of sea level rise. The strategy should define the criteria for estimated sea level rise (i.e., projections of sea level rise from EPA) and should develop measures to avoid or to minimize the effects of sea level rise in permit actions and in Local Coastal Programs. Such measures could include modifying Commission permit requirements to: 1) require that the potential for sea level rise is considered in the design of all development proposals and habitat restoration projects along the ocean shoreline and the shoreline immediately adjacent to or within a harbor, river, bay, or estuary; and 2) require that buffer areas adequate to address sea level rise are included in wetland restoration projects.

