STATE OF CALIFORNIA – THE RESOURCES AGENCY GRAY DAVIS, *Governor*

CALIFORNIA COASTAL COMMISSION
CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
(831) 427-4863

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RECORD PACKET COPY

November 28, 2000

TO: COMMISSIONERS AND INTERESTED PERSONS

FROM: TAMI GROVE, CENTRAL COAST DEPUTY DIRECTOR
CHARLES LESTER, DISTRICT MANAGER
KEVIN COLIN, COASTAL PROGRAM ANALYST

SUBJECT: Commission comments on University of California at Santa Cruz Issue Identification Submittal for proposed Long Range Development Plan at Terrace Point (For Public Hearing and Commission Comment at the Meeting of December 14, 2000)

SYNOPSIS

The University of California at Santa Cruz has submitted an issue identification paper pursuant to the requirement of Section 13504 of the California Code of Regulations (CCR). According to CCR § 13503, the purpose of the issue identification process in this case is to facilitate the preparation of a Long Range Development Plan (LRDP) by determining which policies of the Coastal Act apply to the area in question, as well as to outline tasks to be accomplished in the preparation of the Long Range Development Plan (e.g. specific planning studies and/or CEQA review process).

The University is creating an LRDP for approximately 102 acres of coastal terrace property at the northern tip of the City of Santa Cruz. This site is referred to locally as Terrace Point. The primary purpose of the LRDP would be to guide the development of the University's Institute for Marine Sciences. The Institute would encompass and expand upon existing Long Marine Lab developments, and in doing so would: (1) assist in the development of academic programs and marine instrumentation facilities, (2) facilitate the development of partnerships and collaborations with state and federal marine agency programs, and (3) develop public education and policy related programs.

In this action, the Commission must only tell the University whether the document identifies all Coastal Act policies that are applicable to Terrace Point. In addition, through this Issue Identification comment process, the Commission and other interested parties are afforded the opportunity to address the issues identified by the University, as well as the manner in which the University intends to address these issues through the forthcoming planing process, before substantial work on the draft LRDP is undertaken.

The University submitted this issue identification document in accordance with the requirements of CCR § 13503 and 13504. The full text of the issue identification submittal is attached as Exhibit A.

Further information on the document may be obtained from Kevin Colin at the Central Coast District Office of the Coastal Commission at 725 Front Street, Suite 300, Santa Cruz, CA 95060, (831) 427-4863.

Staff Recommendation

Staff recommends adoption of the following resolution:

Resolution I. (Resolution adopting comments on the University of California Issue Identification Submittal for Terrace Point)

Staff recommends a **YES** vote on the motion below. Approval of this motion will result in the adoption of the findings of this staff report. The motion passes only by an affirmative vote of a majority of the present Commissioners.

Motion. *I move that the Commission* ***adopt*** *the comments contained within the findings of the issue identification staff report dated November 28, 2000.*

Resolution to Adopt. *The Commission hereby* ***adopts*** *the findings contained within the issue identification staff report, according to the requirements of California Code of Regulations Sections 13503 and 13504, and hereby acknowledges that the University has correctly identified all Coastal Act policies that are applicable to Terrace Point.*

Staff Report Contents

1. Findings and Declarations

The Commission finds and declares as follows:

A. Terrace Point Background

General Location & Background

The University of California is preparing a Long Range Development Plan (LRDP) for its coastal terrace property located just within the western boundary of the City of Santa Cruz in Santa Cruz County. Terrace Point was annexed to the City in the early 1980's. As shown on Exhibit B, this 102 acres includes:

- 26 acres at the Younger Lagoon Reserve;
- 16 acres that contain the Long Marine Laboratory (LML) campus and related facilities, including the Center for Ocean Health and the California Department of Fish and Game Oiled Wildlife Facility;
- 60 acres comprising the vacant coastal terrace to the east of the National Marine Fisheries Service building (2.5 acres of this land) including the Discovery Center and areas north of existing development at Terrace Point.

In the general Terrace Point vicinity, agricultural land extends to the west beyond Younger Lagoon along the coast, to the north to the Southern Pacific Railroad tracks, and beyond to Highway 1. The Raytek industrial facility is located directly north of Terrace Point across the railroad tracks. South of Terrace Point lies Monterey Bay and the Pacific Ocean. To the east are the De Anza Mobile Estates (residential) and Natural Bridges State Park. (See Exhibit B)

The approximate 60-acre upland coastal terrace had been the subject of recent planning efforts by ATC Realty Sixteen, Inc., a wholly-owned subsidiary of Wells Fargo Bank. This area is primarily made up of fallow agricultural fields that are now home to coastal meadows and wetlands; they separate Long Marine Laboratory from public City services and have historically delineated the urban/rural boundary on the City's west side. When the Local Coastal Program for the City of Santa Cruz was certified in 1981, the Terrace Point site was not certified, but was designated as part of the Westside Areas of Deferred Certification because the City declined to accept Commission modifications limiting development. Terrace Point remains an Area of Deferred Certification today. Since the University now owns most of Terrace Point, coastal planning is governed by the LRDP process established by the Coastal Act.

Previously Approved Projects & Related Commission Actions

Since adoption of the Coastal Act, the Commission has approved a number of important coastal dependent and/or coastal related developments at Terrace Point. These include:

1. *Coastal Development Permit P-1859.* In 1976 the Commission approved the first significant development on Terrace Point: original Phase I development of the Long Marine Laboratory facility. By doing so, the Commission found: that the lab was a coastal-dependent use which needed to be located in a remote, semi-rural area; that the facility would not adversely affect adjacent agricultural operations; and that public access to Younger Lagoon should be limited to protect the environmentally sensitive lagoon and beach habitats. CDP P-1859 authorized the construction of multiple lab buildings, educational facilities, tanks, sheds and associated infrastructure including the McAllister Way access road from Delaware Avenue, a saltwater exchange system, underground electric and telephone extensions, and a 10,000 gallon sewage holding tank. Through Commission-approved condition compliance for CDP P-1859, public access to Younger Lagoon and the beach environs was generally closed off to the public in 1981 to allow for wetland research and study in a controlled setting. (The Commission will be revisiting this closure in the near future through a reporting requirement under the original conditions of permit approval.)

2. *Coastal Development Permit 3-83-076.* In 1983 the Commission approved the Phase II expansion of the LML Lab. This effectively doubled the size of the original facility and included a new aquarium and museum, as well as additional research facilities, tanks, service buildings, and parking. Several amendments followed from 1985 through 1987 which allowed for modifications to the dolphin tank (3-83-076-A1), an additional LML building (3-83-076-A2), and an aquaculture operation with buildings, tanks, and associated facilities (3-83-076-A3, A4 and a 1987 immaterial amendment).

3. *Coastal Development Permit Amendment 3-83-076-A5.* In 1994 the Commission approved the California Department of Fish and Game (CDFG) Oiled Wildlife Rehabilitation Center on the blufftop plateau above Younger Lagoon, inland from the main assemblage of LML buildings). The CDFG facility provides rescue and rehabilitation services for oiled wildlife and includes two major buildings along with pens, mammal pools, bird holding areas, cage cleaning areas, and parking and storage areas. This CDFG development was followed in 1995 and 1996 by several projects associated with the same upper terrace (inland) site including slope restoration along Younger Lagoon (also numbered 3-83-076-A5), partial change from greenhouse aquaculture use to organic plant propagation (3-83-076-A6), partial change from greenhouse aquaculture use to bioassay operation (3-83-076-A7), and the installation of an equipment storage shed for the CDFG facility (3-83-076-A9 & A10). In 1996 the Commission also authorized chain link and mesh fencing along the eastern property boundary of the Lab (3-83-076-A8).

4. *Coastal Development Permit Amendment 3-83-076-A11.* In 1997 the Commission authorized a private water line extension to serve the LML site. The line was constructed to

public water line specifications and connected to the municipal system at Delaware Avenue. The Commission noted that the then landowner (Wells Fargo/ATC realty) had no legal right to use of the water, did not pay for the improvements, did not incur any taxes or service charges because the water is extended across their property, and entered into a non-exclusive easement with the University to allow the extension of a private line across their property that effectively acknowledged the independence of this water supply from any decisions of the Coastal Commission on future uses of this privately-owned site. Accordingly, the Commission found that the private water line extension would not prejudice preparation of an LCP or LRDP for the site.

5. *Coastal Development Permit 3-97-050.* Later in 1997, the Commission authorized the construction of the Long Marine Lab Marine Discovery Center on the coastal bluff immediately to the east to the Long Marine Lab campus. The Marine Discovery Center consists of the Education/Visitor Center and Teaching Laboratory (approximately 19,000 gross square feet) and a parking lot for 53 cars. While not processed as an amendment to the base permit, the Discovery Center is a component of the overall LML campus. This is clearly evident in the Commission's Discovery Center authorization that included the conversion of the LML 10,000 gallon concrete septic vault to a sewage pump station and the connection of this system to the City's wastewater system at the intersection of Delaware Avenue and Shaffer Road. Use of this sewer line was, and is, limited to existing permitted development at the LML site.

6. *Consistency Determination CD-50-98.* In 1998 the Commission concurred with the consistency determination of the National Marine Fisheries Service (NMFS) for the development of a fisheries research laboratory on a 2.5 acre parcel of land directly east of LML property and McAllister Way on the Terrace Point parcel (CD-50-98). The NMFS facility is just being completed as is a 53,400 square foot, 2-story laboratory building, with 53 parking spaces, site landscaping, and utilities, and a seawater intake station on the adjacent LML site. Although clearly interrelated (in terms of use, proximity and partnership programs), the NMFS facility is not part of the LML campus.

7. *Coastal Development Permit Amendment 3-97-050-A1.* In July of 1999, the Commission authorized a slight modification to the 1997-authorized sewer line. This modification allowed the University to connect the LML sewer system to the system to be constructed by NMFS instead of constructing a second redundant sewer line connection to the municipal system at Delaware Avenue and Shaffer Road.

8. *Coastal Development Permit Amendment 3-83-076-A13.* In August of 1999, the Commission approved the removal of several smaller LML structures to be replaced with the Center for Ocean Health, consisting of a 23,000 square foot laboratory and administration building (36-feet high), a 2,300 square foot shop building (17.5-feet high); and a reconfigured and paved 31 space parking lot. The Center for Ocean Health is currently under construction and will facilitate marine research at Long Marine Laboratory (LML) by replacing aging and inefficient temporary facilities with high quality lab, office,

and support space in close proximity to the seawater laboratories and the current LML cluster of buildings and facilities.

B. Commission Comments

1. Preparing the Long Range Development Plan (LRDP)

The LRDP Planning Process: An Overview

What is a Long Range Development Plan? A Long Range Development Plan (LRDP) is essentially the functional equivalent of a Local Coastal Program, with some exceptions. Section 13502 of the California Code of Regulations defines a LRDP:

> *"Long Range Development Plan" hereinafter referred to as "LRDP" means the relevant portions of the land use plans and policies for the physical development of campuses and educational facilities of the University of California or the California State University and Colleges, which are sufficiently detailed to indicate the kinds, location and intensity of land uses, the applicable resource protection and development policies and, where necessary, a listing of other implementing actions.*

As described by CCR § 13502 above, the LRDP will eventually take a form that is largely analogous to a Local Coastal Program (LCP). Like an LCP, the LRDP must contain a land use plan, as well as implementing measures similar to those found in a zoning ordinance. For example, the LRDP should include a land use portion containing resource protection and public access policies, to name a few; the land use portion should also delineate the kinds, locations, and intensities of development. Also, the LRDP should contain an implementing section describing how the land use policies will be carried out. As mentioned, though, there are some key differences between LCPs and LRDPs; two of these include the level of detail contained within the planning document and how development is ultimately carried out.

Concerning the first difference, LRDP and LCP documents typically differ in their level of detail. Generally, an LRDP is more geographically specific in terms of the application of land use policies; and this is largely because University lands tend to cover less area than, for example, a city or county. In other words, while an LCP might contain policies that are applicable to any entire city or county, an LRDP tends to prescribe *specific* policy language to a much smaller geographic area; and overall, the LRDP is probably more akin to a specific plan with implementing provisions.

The second difference concerns the manner in which development can proceed under a certified LRDP as opposed to under an LCP. Under a certified LRDP, the University Staff or Regents do not approve a development, but rather send a "notice of impending development" to the Commission. The University must send this notice 30 days prior to beginning construction. Once in receipt of this notice, Commission Staff will review the proposed project for consistency with the certified LRDP and formulate a recommendation to the Commission. Once before the Commission, the proposed project will be reviewed for consistency with the LRDP. If the Commission finds that the proposed

development is consistent with the certified LRDP, then development may proceed. However, if the Commission finds the proposal inconsistent, then additional conditions may be added to insure consistency. Thus, the key difference between an LCP and LRDP is that the Commission cannot deny development prescribed under a certified LRDP, but can only condition such development proposals if it finds inconsistensies with the certified LRDP.

How does the LRDP Preparation Process Work? The first step to the preparation of an LRDP is the preparation of a Coastal Act issue identification paper. According to California Code of Regulation (CCR) § 13503, the purpose of the issue identification submittal is described as follows:

> *Pursuant to Public Resources Code Sections 30500(c) and 30501(a), an identification of coastal conservation and development issues shall be made as the first step in the preparation of an LCP or LRDP. For LCPs and LRDPs, the purpose of the "issue identification" is to:*
>
> *(1) determine the policies of the Coastal Act that apply in each jurisdiction;*
>
> *(2) determine the extent to which existing local plans are adequate to meet Coastal Act requirements; and*
>
> *(3) delineate any potential conflicts between existing plans and development proposals and the policies of the Coastal Act.*

In this case, numbers one and three above are most applicable to Terrace Point because there is no existing Long Range Development Plan for the site; the University has elected to prepare a new planning document. Therefore, in light of the absence of existing plans meeting Coastal Act requirements, the University submitted an issue identification document that determines the applicability of Coastal Act policies and outlines future tasks to be accomplished in preparing the draft LRDP.

In response to the Issue Identification submittal, the Commission must determine whether the University's submittal identifies all Coastal Act policies applicable to Terrace Point. Also, the Commission has the opportunity to comment on the contents of the submittal, as well as the University's tasks to be done prior to the completion of a draft Long Range Development Plan. Overall, substantial potential Coastal Act policy conflicts should be set forth as coastal planning issues to be addressed in the LRDP.

Under this framework, upon completion of the Issue Identification review process, the University is to then begin the preparation of a draft LRDP according to the methodology outlined in Coastal Commission Regulation (CCR) Sections 13506 through 13514. In summary, these sections require that the draft LRDP include:

- An application of Chapter Three policies of the Coastal Act to determine the kind, location, and intensity of land and water uses that would be in conformity with the Act;
- Measures necessary to achieve conformity with the policies of Chapter Three of the

Coastal Act;

- Plans which include: (1) the specific type of development activity or activities proposed to be undertaken, (2) the maximum and minimum intensity of such activity or activities, (3) proposed and alternative locations considered to be undertaken, (4) a capital improvement program or other implementing devices, (5) other information deemed necessary by the Executive Director of the Commission;

- An analysis of existing and proposed capacities, decision points for expansion, and portion reserved for priority uses if the Chapter Three policies of the Coastal Act limit or condition the amount, timing, or location or public works facilities;

- Proposed categories of development not requiring a coastal development permit;

- A public access component detailing the kinds and intensities of uses, specific geographic areas proposed for direct physical access to coastal water areas (including an implementation schedule);

- The consideration and description of uses of more than local importance (i.e. coastal agriculture, wildlife habitats, public access uses, visitor-serving developments, coastal dependent research institutions.).

Along with the completion of the draft LRDP, the University will initiate the CEQA review process; the CEQA document will provide a supplemental planning tool to be used in further refining the draft LRDP. Once completing the draft CEQA document, the Commission may hold a public hearing, according to CCR § 13557 and 13558, and direct staff to make comments and/or request additional information. Regardless as to whether the Commission holds a public hearing on the CEQA document, Commission staff will forward comments on the draft CEQA document to the University on behalf of the Commission. Comments by the Commission or its staff are intended to aid the University in preparing adequate environmental documents, and should not be construed as to which action the Commission may take with regards to certification of the LRDP.

Following completion of the CEQA review process, the University will finalize the LRDP for submittal to the Commission. However, before completing a final LRDP, the University is expected (under CCR § 13516) to consult with Commission staff in order to resolve issues as to the conformity and sufficiency in meeting the requirements of the Coastal Act. In addition, the University also has the option, under CCR § 13517, of soliciting a preliminary non-binding review of the draft LRDP by the Commission; the public would likewise have the opportunity to comment during such a review by the Commission. After consultations with Commission staff and/or the Commission, the University will then submit a final LRDP to the Commission for certification.

After receiving the final draft LRDP, Commission staff will review the submittal for completeness under CCR § 13520 and, if deemed complete, will schedule a public hearing and prepare a recommendation to the Commission. The public and other interested persons will also have the opportunity to comment during the Commission's review of the final LRDP submittal. Once

reviewed by the Commission, action will be taken, similar to that taken on an LCP or LCP amendment, upon the LRDP. In other words, the Commission may certify the LRDP as submitted, deny the submittal, or certify it with modifications.

Recent LRDP Planning Efforts for Terrace Point

Since acquiring the 60 acres adjacent to the Long Marine Laboratory (LML) complex, the University has initiated the preparation of a Long Range Development Plan (LRDP) for the entire Terrace Point site. This approach is consistent with previous findings of the Commission which essentially state the Commission's preference that, before additional development could take place at Terrace Point, a governing authority would need to produce an LCP or LRDP for the site. As such, the pursuit of a comprehensive plan that will both fulfill the requirements of the Coastal Act and guide potential future development in a manner which best addresses coastal resources is welcome.

As already noted, the first step to the formulation of an LRDP for this site is the identification of issues, as related to the policies of the Coastal Act. Once properly identified, these issues provide a basis for the establishment of development constraints that protect resources at the site. Section 13504 (c) of the Commission's regulations state:

> *The governing authority shall transmit copies of its issue identification, including a statement regarding the manner in which the local government or governing authority intends to address coastal planing issues organized into an outline of major tasks to be performed....before beginning any substantial work on its LCP or LRDP. . .*

The Commission notes that the LRDP issue identification and California Environmental Quality Act (CEQA) review process are both expected to flesh out the development constraints of this site. Once these constraints are known in more detail, the University can best proceed with formulating the type, location, and intensity of development appropriate for the site.

The Commission also notes, though, that the process that has occurred to date has not strictly followed the above described sequential approach. The University has developed a number of site plan alternatives somewhat separate from, although generally within the context of a Coastal Act issue identification and resource constraints analysis. (See Exhibit C for site plan alternatives.) Although this process of alternatives development has been useful in framing the initial discussion of future development at Terrace Point, the Commission also expects that the University will remain open to the identification of a full range of potential development patterns while proceeding through the forthcoming issue identification and constraints analysis processes. In particular, the Commission notes that, in terms of their proposed intensity of development, the site plan alternatives appear very similar. Also, as the following findings indicate, they do not in all cases reflect scenarios that might be expected to emerge from the issue identification and subsequent analyses. For purposes of a meaningful evaluation of alternatives under (CEQA), other alternatives should be considered. In addition to the "no project" alternative, one of these alternatives should include a substantial decrease in the intensity of development represented in the three site plan alternatives. It is anticipated that this issue identification discussion, and Commission staff comments to be

submitted in the CEQA review process, will aid the detailing of such a lower intensity alternative.

2. Wetlands and Other Environmentally Sensitive Habitat Areas (ESHAs)

Applicable Coastal Act Policies

The issue identification submittal (attached as Exhibit A) correctly identifies that the following Coastal Act policies pertaining to the protection of wetlands and other environmentally sensitive habitat areas are applicable to Terrace Point:

§ 30230: Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

§ 30231: The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

§ 30232: Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

§ 30233: (a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

(l) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.

(2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.

(3) In wetland areas only, entrance channels for new or expanded boating facilities; and

in a degraded wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities, shall not exceed 25 percent of the degraded wetland.

(4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.

(5) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

(6) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.

(7) Restoration purposes.

(8) Nature study, aquaculture, or similar resource dependent activities.

(b) Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. Dredge spoils suitable for beach replenishment should be transported for such purposes to appropriate beaches or into suitable long shore current systems.

(c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary. Any alteration of coastal wetlands identified by the Department of Fish and Game, including, but not limited to, the 19 coastal wetlands identified in its report entitled, "Acquisition Priorities for the Coastal Wetlands of California", shall be limited to very minor incidental public facilities, restorative measures, nature study, commercial fishing facilities in Bodega Bay, and development in already developed parts of south San Diego Bay, if otherwise in accordance with this division.

(d) Erosion control and flood control facilities constructed on water courses can impede the movement of sediment and nutrients which would otherwise be carried by storm runoff into coastal waters. To facilitate the continued delivery of these sediments to the littoral zone, whenever feasible, the material removed from these facilities may be placed at appropriate points on the shoreline in accordance with other applicable provisions of this division, where feasible mitigation measures have been provided to minimize adverse environmental effects. Aspects that shall be considered before issuing a coastal development permit for such purposes are the method of placement, time of year of placement, and sensitivity of the placement area.

ESHA Issues Identified by the University

The University's submittal identifies the following Coastal Act issues, summarized below, addressing the protection of wetlands and other environmentally sensitive habitat areas:

- What development siting criteria, controls, and resource management measures are necessary to protect ESHAs?
- What are the existing values of habitats at Terrace Point, and are there measures to enhance habitat values here?
- Are there other ESHAs besides wetlands on site?
- How will listed species be protected?
- How will construction and post-development activities prevent long term impacts to sensitive habitats?
- How will non-point source pollution be managed?

Commission Comments Relative to ESHAs at Terrace Point

The Terrace Point site includes substantial wetland and other ESHAs, including sensitive habitats both atop the coastal terrace and Younger Lagoon itself. Younger Lagoon traverses the eastern border of Terrace Point and is a University of California Natural Reserve, harboring a diverse range of habitats for a variety of species. This area is protected as a wildlife refuge, and has historically provided for research and teaching in the field sciences. There are other ESHAs, potentially connected biologically to Younger Lagoon, which occupy large portions of the coastal terrace. These include the large wetland nearest Long Marine Laboratory, the smaller wetland complex adjacent to the National Marine Fisheries Service building, and the wet meadow and riparian areas north of McAllister Way (toward the railroad tracks).

University staff are currently relying upon the 1997 wetland delineation for wetland constraints mapping. Commission and University Staff met at the project site on September 15, 2000 to discuss the issue of current wetland boundaries. At this meeting, the methods of past wetland delineations were discussed, providing a useful context for understanding the processes that led to the reduction in the area of wetlands between 1993 and 1997. As a result of this site visit and a review of substantive file materials, the 1997 wetland delineation appears to generally accurately portray current site conditions.

In addition to currently identified wetland boundaries, the Commission notes that the presence and/or extent of additional ESHAs at the project site, such as sensitive upland wetland and/or riparian-willow habitats, has yet to be determined. Similarly, the Issue Identification echoes this point, and the LRDP and CEQA document are expected to address this topic. On a similar note, based upon observations by the Commission's Biologist during the September 15, 2000 site visit, it appeared that the current extent of the wetland area adjacent to the De Anza mobile home-park might not be

accurately depicted on the University's 1997 delineation. Similarly, the extent of wetlands at the extreme southeast corner of the site may not be acurrately portrayed. Therefore, the LRDP will need to investigate the current extent of wetlands at these locations.

The University's submittal identifies the issue of existing habitat values, as well as the issue of the potential for habitat enhancement. The Commission notes that, within the overall LRDP context, the Lagoon is probably the most important environmentally sensitive habitat area here. The Lagoon is one of the few remaining natural coastal wetlands in Santa Cruz County, and harbors a diverse range of aquatic and terrestrial habitats and species. Similarly, habitat areas upon the coastal terrace and which are biologically connected to Younger are also of high resource value both due to significant wildlife use for forage and roosting, as well as their proximity to Younger Lagoon. In terms of other wetland areas upon the coastal terrace, the Issue Identification submittal describes these areas as containing little or no wildlife value. However, site planning under the LRDP and CEQA document needs to be better understand the full value of these areas both individually, as well as their role as part of an interconnected system whose productivity should be fostered to the degree possible. As such, it would appear appropriate for the LRDP to investigate and analyze habitat values at Terrace Point within this context.

Concerning the wetland areas that have decreased from 1993 to 1997, the Commission notes that, just as a variety of factors led to a reduction of these wetland areas, a combination of other factors could lead to an increased wetland area in the future. Given that the site has historically supported a much larger wetland complex, it appears that areas delineated in 1993 (but not 1997) could be addressed within a larger resource potential context.

For each known (and potential) ESHA area, the LRDP must provide for avoidance of these resources, and must include adequate buffers to assure the protection of all such areas. Similarly, the LRDP should include management provisions to assure the continuance and enhancement of identified ESHA areas. The University's submittal has appropriately identified post-construction habitat management as an issue. Potential restoration areas that may improve existing habitat values and improve overall habitat connectivity should be identified as well. For example, it would appear appropriate for the LRDP to investigate the potential for restoration of a wildlife corridor between Younger Lagoon and Antonelli pond across the northern wet meadow area. Likewise, the LRDP might also investigate the feasibility of improved connectivity between the large seasonal pond and Younger Lagoon.

Commission Comments on Current Site Plan Alternatives

As noted, the University has already prepared site plan alternatives in advance of finalizing the issue identification. Although each of the proposed site plan alternatives has defined open space areas, generally along the bluffs and surrounding the existing cluster of Long Marine Lab buildings, the proposed three site plan alternatives raise a host of concerns. Each scenario appears to propose inadequate buffers with development atop or within close proximity to wetlands, and may not reflect the extent of all ESHAs at the site. As a case in point, each alternative does not include the small wetland to the northeast of the McAllister Way (sample point number N55 of the 1997 delineation).

In fact, it appears that the proposed residential development in Alternative B is located upon or in very close proximity to this wetland. This wetland must be considered in all site planning and an appropriate buffer should be established. Likewise, the proposed residential development in alternative B is inadequately buffered from wetlands in this vicinity, and does not appear to account for the potential habitat, and wildlife corridor, in this area. (See Exhibit B for map of 1997 wetlands.)

Some of the currently considered alternatives appear to show insufficient buffers to protect known ESHA areas. Specifically, in terms of the wetland adjacent to the De Anza mobile home site, it appears that proposed development in Alternative B is not sufficiently setback from this wetland, while (as mentioned above) the current extent of this wetland may change after further investigation. In terms of the large seasonal pond, the Commission notes that each alternative proposes a development setback of 100-feet from this wetland. However, in terms of all the wetlands at the project site, this wetland (aside from Younger Lagoon) probably has the highest habitat value. All biologists (University and Commission) present at the September 15, 2000 site visit concurred that this wetland deserves a minimum buffer of 150 feet, and that 200 feet may indeed be the more appropriate distance. Therefore, the Commission recommends that the setback in this area be redesigned to account for a larger setback.

The Commission notes that each alternative contains patches of what appear to be bright green landscaped areas adjacent to various pathway segments. The nature of these proposed landscape areas is unclear. At a minimum, these proposed landscaped areas should include only native plant species that are compatible with, and enhance the value of, existing native plant communities at the site. In addition, it is unclear to what extent indirect impacts from lights or other activities have been taken into account in the planning so as to protect these habitats and the species that depend upon them. These points should be clarified in the forthcoming draft LRDP and CEQA anlaysis.

The Commission notes that each alternative proposes a large "storage-maintenance lay-down yard" atop a western bluff overlooking Younger Lagoon. This area does not appear to be appropriate for the mass, scale and intensity of use shown in each of the proposed alternatives. In fact, this is an area on the site that might best be considered for exclusive habitat protection purposes, including the potential for restoration as upland habitat. Furthermore, it is unclear from the plans what, if any, buffers are proposed here. Appropriate buffers between Younger Lagoon and any proposed development are critical for its continued protection, and the forthcoming draft LRDP and CEQA document should address this.

3. Preservation of Agricultural Uses

Coastal Act Policies Applicable to Terrace Point

The issue identification submittal correctly identifies that the following Coastal Act policies with regards to the protection of agricultural lands in the vicinity of Terrace Point are applicable:

> *§ 30241: The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas agricultural economy, and*

conflicts shall be minimized between agricultural and urban land uses through all of the following:

(a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.

(b) By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.

(c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.

(d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands.

(e) By assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.

(f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b), and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.

§ 30241.5: (a) If the viability of existing agricultural uses is an issue pursuant to subdivision (b) of Section 30241 as to any local coastal program or amendment to any certified local coastal program submitted for review and approval under this division, the determination of "viability" shall include, but not be limited to, consideration of an economic feasibility evaluation containing at least both of the following elements:

(1) An analysis of the gross revenue from the agricultural products grown in the area for the five years immediately preceding the date of the filing of a proposed local coastal program or an amendment to any local coastal program.

(2) An analysis of the operational expenses, excluding the cost of land, associated with the production of the agricultural products grown in the area for the five years immediately preceding the date of the filing of a proposed local coastal program or an amendment to any local coastal program.

For purposes of this subdivision, "area" means a geographic area of sufficient size to provide an accurate evaluation of the economic feasibility of agricultural uses for those lands included in the local coastal program or in the proposed amendment to a certified local coastal program.

(b) The economic feasibility evaluation required by subdivision (a) shall be submitted to the commission, by the local government, as part of its submittal of a local coastal program or an amendment to any local coastal program. If the local government determines that it does not have the staff with the necessary expertise to conduct the economic feasibility evaluation, the evaluation may be conducted under agreement with the local government by a consultant selected jointly by local government and the executive director of the commission.

§ 30242: All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless (l) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.

§ 30243: The long-term productivity of soils and timberlands shall be protected, and conversions of coastal commercial timberlands in units of commercial size to other uses or their division into units of noncommercial size shall be limited to providing for necessary timber processing and related facilities.

Agricultural Issues Identified by the University

The University's submittal identifies the following Coastal Act issues, summarized below, addressing the protection of agriculture in the vicinity of Terrace Point:

- What measures can be employed to minimize conflicts between nearby agricultural operations and assure the continued compatibility of these lands?

Commission Comments Relative to Protecting Agricultural Lands

Prior to 1976, the entire Terrace Point site, including the area west of McAllister Way, was actively farmed. While areas to the west of McAllister Way were converted in 1976 (and again in 1983) from agricultural use to marine laboratory use, the remainder of the property formerly owned by Wells Fargo was in active agricultural production as recently as 1988.

Adjacent agricultural operations have coexisted with LML facilities for over twenty years; the University's submittal rightly identifies the issue of continued compatatiblity. Therefore, the primary issue that is raised by the LRDP is the implementation of adequate buffers and legal mechanisms to avoid or reduce any potential impacts to or conflicts with adjacent agricultural lands and uses. As a reference point, the Commission's actions to date have not established a specific buffer distance, but rather have deferred the establishment of such to the LRDP. Thus, the current issue with the LRDP concerns the establishment of an appropriate buffer between development on the urban fringe of the City and the existing Younger Ranch agricultural lands to the west and north of the site on the far side of Younger Lagoon. In addition, a second issue concerns the establishment of allowable uses within buffers areas and legal mechanisms to assure buffer effectiveness.

The LRDP should investigate and establish the implementation of buffers adequate to assure the continued viability of adjacent agricultural operations. For example, the proximity of non-agricultural uses at Terrace Point to standard adjacent agricultural practices (such as chemical spraying and fertilizing) or ongoing agricultural by-products (such as dust and noise from machine operations – cultivating, spraying, harvesting, et al) should not be seen as incompatible and/or a threat to the non-agricultural uses. The Commission notes that appropriate buffers are particularly relevant here because of the high prevailing westerly winds which typically sweep across this relatively treeless area bringing noise, dust, and odors from adjacent farming operations to this site. The LRDP and CEQA document should address these issues in detail.

Commission Comments Relative to the Current Site Plan Alternatives

Each of the alternatives proposes an agricultural setback from 300 to 500 feet. In past actions, the Commission has been careful to keep development generally outside of the 500-foot distance in recognition that the valuable coastal agricultural lands surrounding the site. The Commission also required the reserve of this buffer so that individual developments would not prejudice the preparation of a LCP or LRDP for the site. Without additional information on site specific conditions and the performance of other buffers used on similar situated sites, it is difficult for the Commission to comment on the site plan alternative outside the context of the above-discussed measures that might ensure continued compatibility here. Therefore, clarification of appropriate setbacks, additional mechanisms to be implemented within the buffer (e.g. vegetative barriers), or legal instruments (i.e. hold-harmless deed restriction), will be needed through the development of the LRDP in order to evaluate whether the alternatives will ensure the continued viability of adjacent agricultural lands. In addition, the Commission notes that multiple policies work in tandem on this site in that the implementation of an appropriate agricultural setback is expected to serve dual purposes by also affording a greater degree of protection to identified wetlands and riparian areas to the north of McAllister Way.

4. Public Viewsheds

Coastal Act Policies Applicable to Terrace Point

The issue identification submittal correctly identifies that Coastal Act § 30251, concerning the protection of public viewsheds, is applicable to Terrace Point. This section states:

> *§ 30251 The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its*

setting.

Public Viewshed Issues Identified by the University

The University's submittal identifies the following issues, summarized below, concerning the protection of public viewsheds across Terrace Point:

- How can the LRDP protect and minimize impacts to visual resources?
- What are important view corridors and visual qualities at Terrace Point needing protection?

Commission Comments Relative to the Protection of Public Viewsheds

The area subject to the LRDP is located on a coastal bluff on the western edge of the City of Santa Cruz with Monterey Bay to the south, the agricultural lands of Santa Cruz County to the west, and the Raytek plant to the north. To the east, beyond Terrace Point as viewed from Highway 1, is the low profile De Anza Mobile Home Park. This site provides both a visual and land use transition between urban uses and the undeveloped north coast. The LML/Terrace Point property is in a highly scenic location, being visible from Highway 1 and located at the entryway to the City for southbound travelers from rural Santa Cruz County. Views entering Santa Cruz on Highway 1 from the north include the open fields of Terrace Point, and in the distance the CDFG Oiled Wildlife Facility, the Long Marine Laboratory water towers, the Marine Discovery Center, and now the National Marine Fisheries Service building. The site is also visible from the hills and various other vantage points within Wilder Ranch State Park, from the bluff and beach at Natural Bridges Beach State Park, from the foothills of the publicly owned Bombay property, and the waters of the Monterey Bay.

The University's submittal identifies the issue of needing to locate public viewsheds that the LRDP should protect. Commission staff discussion with the University have explained that the LRDP public viewshed analyses should consider, at a minimum, views from: (1) Wilder Ranch State Park; (2) Highway 1; (3) Natural Bridges State Park; (4) public beach areas; (5) Bombay property; and (6) waters of the Monterey Bay.

In terms of past actions, the Commission has previously found that it does not view permitted development to date as being indicative of the general scale of development appropriate for the remainder of the site. More specifically, the Commission has found that, with the completed construction of the proposed Ocean Health Building (3-83-076-A13), the Marine Discovery Center (3-97-050), the NMFS facility (CD-50-98), the CDFG facility (3-83-076-A5) and the remainder of the developed LML campus site, a significant cumulative visual impact from building scale and site coverage has already occurred. Overall, though, the Commission has also found that additional potential impacts to the viewshed could only be accounted for (and thereby avoided or mitigated) through future planning efforts for Terrace Point (i.e. the LRDP). Thus, future development proposals for Terrace Point must be evaluated within the context of the entire site, including the partial commitment, balanced by wide expanses of open space, to development that the LML campus currently represents. Therefore, the University's submittal correctly raises the issue of identifying

means by which the LRDP can avoid and minimize public viewshed impacts. As a starting point, the LRDP should consider the following variables important to an evaluation of public viewshed impacts: (1) location and arrangement, (2) size, (3) mass, and (4) scale of proposed development. Therefore, University Staff will need to keep these variables in mind when formulating proposed development types, intensities, and locations under the LRDP; and likewise, during an analysis of the potential viewshed impacts that may derive from any specifically-selected proposed development scheme.

Commission Comments Relative to the Current Site Plan Alternatives

Absent the 3-dimensional specifics of development envelopes represented in the proposed alternatives, as well as the absence of a detailed visual analysis for proposed development types and locations, it is premature for the Commission to comment fully on the potential viewshed impacts resulting from each alternative. Nonetheless, the Commission is concerned that the proposed alternatives illustrate substantial new buildings, whose massing raise serious questions of consistency with the Coastal Act in this respect. Additionally, contemplated heights of 2 to 3 stories raise similar concerns.

5. Public Access and Recreation

Coastal Act Policies Applicable to Terrace Point

The issue identification submittal correctly identifies that Coastal Act Sections 30210-30214 and 30220-30224, pertaining to the provision of public access and recreation areas, are applicable to Terrace Point. These sections state:

> *§ 30210: In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*
>
> *§ 30211: Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*
>
> *§ 30212: (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:*
>
> *(1) It is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,*
>
> *(2) Adequate access exists nearby, or,*

(3) Agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.

(c) Nothing in this division shall restrict public access nor shall it excuse the performance of duties and responsibilities of public agencies which are required by Sections 66478.1 to 66478.14, inclusive, of the Government Code and by Section 4 of Article X of the California Constitution.

§ 30212.5: Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.

§ 30213: Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

The commission shall not: (1) require that overnight room rentals be fixed at an amount certain for any privately owned and operated hotel, motel, or other similar visitor-serving facility located on either public or private lands; or (2) establish or approve any method for the identification of low or moderate income persons for the purpose of determining eligibility for overnight room rentals in any such facilities.

§ 30214: (a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

(1) Topographic and geologic site characteristics.

(2) The capacity of the site to sustain use and at what level of intensity.

(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.

(4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

(b) It is the intent of the Legislature that the public access policies of this article be carried out in a reasonable manner that considers the equities and that balances the rights of the individual property owner with the public's constitutional right of access pursuant to Section 4 of Article X of the California Constitution. Nothing in this section or any

amendment thereto shall be construed as a limitation on the rights guaranteed to the public under Section 4 of Article X of the California Constitution.

(c) In carrying out the public access policies of this article, the commission and any other responsible public agency shall consider and encourage the utilization of innovative access management techniques, including, but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.

§ 30220: Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

§ 30221: Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

§ 30222: The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

§ 30223: Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

§ 30224: Increased recreational boating use of coastal waters shall be encouraged, in accordance with this division, by developing dry storage areas, increasing public launching facilities, providing additional berthing space in existing harbors, limiting non-water-dependent land uses that congest access corridors and preclude boating support facilities, providing harbors of refuge, and by providing for new boating facilities in natural harbors, new protected water areas, and in areas dredged from dry land.

Public Access & Recreation Issues Identified by the University

The University's submittal identifies the following Coastal Act issues, summarized below, with regards to the provision of public access and recreational opportunities at Terrace Point:

- How will the LRDP assure that development maintains and enhances public access?
- How will changes in transit services, traffic, parking, on-site public access facilities, public education programs, and on-site services affect public access?
- How will the resource values of Younger Lagoon be balanced with public access at Terrace Point?

- How will public access be provided while maintaining marine laboratory security?
- How will safe bluff-top access be provided, consistent with the protection of ESHAs?
- Is vertical access to the foot of the bluff for public access and surfing feasible?
- What is the location and nature of historic accessways at Terrace Point?
- What is the appropriate signage for public access?
- How will the LRDP assure on-going management of public access?

Commission Comment Relative to Public Access & Recreation Opportunities at Terrace Point

Portions of the Terrace Point site have been used for public access to and along the shoreline for many years, and continue to this day. Public access to Younger Lagoon and the adjacent beach environs, though, was generally closed off in 1981 to allow for wetland research and study in a controlled setting. In closing off public access to the area west of Long Marine Laboratory (LML) in 1981, the Commission found that uncontrolled public access to the lagoon and beach area conflicted with Coastal Act Section 30212(a)(1) because of the sensitive nature of the lagoon and beach resource. However, up until this decision, the Younger Lagoon beach area was quite popular, particularly with UCSC students. Since the closure, some continued public access use has been observed by Commission staff, particularly of the forebeach area by surfers who descend the coastal bluff at the southwest corner of the LML property.

Since management is a key determinant of public access impacts, the Long Range Development Plan (LRDP) will need to clearly describe parameters for public use of the site; the University's submittal appropriately identifies this issue. In terms of methods that the draft LRDP should follow in prescribing public access amenities for Terrace Point, University Staff should consult California Code of Regulations (CCR) § 13512. This section requires the submission of a public access component within the LRDP; it must set forth in detail the kinds and intensity of uses and specific areas proposed for direct physical access. On the whole, with the Terrace Point property now in public ownership, it would appear appropriate that the LRDP will actively pursue maximizing public access consistent with the directive of the Coastal Act. Terrace Point should be open and available to the general public in both managed and open contexts. Since there are certain areas where controlled experiments and research occurs that may restrict such access; the University's submittal identifies this as a potential conflict and issue. Likewise, the University's submittal rightly raises questions of potential habitat-access conflicts.

On this point and as required by the parameters of the original closure two decades ago, the Commission will meet in the near future to decide whether Younger Lagoon should remain closed to public use. The Commission's ultimate decision will affect public access parameters for the site. Nonetheless, the Act directs that public access must balance the sensitivity of habitat with the public's right to access the coast. Though not as large as Younger, another case in point is the large seasonal wetland nearest to LML that is an important habitat area that provides habitat for various

avian species. The LRDP will need to investigate whether public pathways (designed and/or managed to allow for an increase in the frequency and proximity of human contact) near to such habitats areas are appropriate. The LRDP and CEQA document should include an analysis of this, and other, habitat-access issues.

Commission Comments on Current Site Plan Alternatives

Concerning the proposed alternatives currently under review by the University, each depicts a different configuration of orange colored pathways across the site. It appears that these pathways are meant to depict public paths. It is unclear, however, whether the white colored road configuration in each alternative is intended to represent public pathways; this point needs further clarification. To date, University staff has expressed an interest in prohibiting public access within areas between Younger Lagoon and McAllister Way, and because of this, it is unclear where, for example, Alternatives A & B propose public access to the east of each proposed new road alignment. In addition, the placement of previously approved and/or proposed fencing will also require further consideration.

6. Geology

Coastal Act Policies Applicable to Terrace Point

The issue identification submittal correctly identifies that Coastal Act Section 30253, relating to the assurance of geologically stable development, is applicable to Terrace Point. This policy states:

> *§ 30253: New development shall:*
>
> *(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
>
> *(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*

Geologic Issues Identified by the University

The Issue Identification submittal identifies the following issues, summarized below, regarding geologic and bluff erosion issues at Terrace Point:

- How will development be sited to assure that increased erosion and future needs for shoreline protection are not needed?

Commission Comment Relative to Ensuring Geologically Stable Development at Terrace Point

The University's submittal correctly raises that issue of needing to assure that potential future development will not require shoreline protection nor induce erosion. In terms of vehicles that will

help accomplish these objectives, the LRDP and CEQA documents should evaluate the geologic stability of the coastal bluff here and recommend an appropriate buffer accordingly. Concerning the prevention of erosion on site, the LRDP should include provisions and/or standards, such as Best Management Practices, to prevent excessive erosion. Any special geologic concerns should also translate into policies that will direct the appropriate location and engineering of future structures. The Commission notes that each site plan alternative proposes a bluff-top setback of 300-feet. Based on currently available information, this proposed setback appears to be appropriate, provided that development is prohibited in perpetuity within the buffer, and also under circumstances that assure continued public access along the bluff-top through the life of the campus.

7. Public Services – Stable Urban Rural Boundary

Coastal Act Policies Applicable to Terrace Point

The issue identification submittal correctly identifies that Coastal Act Sections 30241(a), pertaining to the provision of a stable urban/rural boundary, and Sections 30250, 30252, 30253 (4), and 30254 with reference to the provision of public services are applicable to Terrace Point. These policies state:

§ 30241: The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:

(a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.

§ 30250: (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall 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 and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall 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.

§ 30252: The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the

potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

§ 30253(4): New development shall: Minimize energy consumption and vehicle miles traveled.

§ 30254: New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division; provided, however, that it is the intent of the Legislature that State Highway Route l in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

Public Service and Stable Urban/Rural Boundary Issues Identified by the University

The Issue Identification submittal identifies the following issues, summarized below, concerning public services and the stability of an urban/rural boundary at Terrace Point:

- How will the LRDP concentrate development, complete a logical and viable neighborhood, and/or establish a stable urban/rural boundary?
- How can adequate public services be made available to Long Marine Laboratory (LML) without destabilizing the urban/rural boundary?
- How will the LRDP assure that development maintains and enhances public access to the coast?
- What is the appropriate location and amount of public parking?

Commission Comment Relative to Public Services and a Stable Urban/Rural Boundary

Access to the LML site currently is provided by a private road (on a non-exclusive easement) which extends from the Delaware Avenue-Shaffer Road intersection to McAllister Way; McAllister is a private 20-foot wide oil and gravel road which runs along the eastern edge of the Long Marine Laboratory site. A security gate with keyed access at Shaffer Road restricts public access to LML after hours. Delaware Avenue is a 2-lane collector street which runs parallel to Mission Street (Highway 1); several streets provide connections between Mission Street and Delaware Avenue.

Although Terrace Point is connected to water, sewer, gas, and electrical lines servicing the City of Santa Cruz, these services are not public. Because of the private nature of these services and the legal mechanisms preventing their extension, the Commission has found that previous development at the site would not be growth inducing. Concerning the LRDP, the primary issue on this point concerns the establishment of a clear and effective stable urban/rural boundary; the University's submittal appropriately details this issue.

In addition to demonstrating that adequate (but not excessive) services are available for existing and proposed development, the LRDP will need to address the issue of preserving a stable urban-rural boundary here. Specifically, the LRDP should investigate measures, similar to those provided for in the recent Watsonville LCP Amendment 1-99 (i.e. utility prohibition zones, "non-access" easements, minimized utility line sizes, etc.) that would achieve such a boundary.

Concerning road configurations, it would appear appropriate for the LRDP to pursue a circulation pattern that minimizes the number and extent of road areas. Additionally, the LRDP should investigate and, where feasible, include provisions for off-site parking in conjunction with continued shuttle service to the site. On a similar note, the impact of proposed development upon nearby coastal access routes, particularly Highway 1 and Mission Street, will need to be investigated and addressed in the LRDP. Finally, it should be noted that potential traffic impacts are but one of many factors that will need to be considered in deriving the appropriate intensity of development at Terrace Point.

Commission Comment Relative to Current Site Plan Alternatives

The Commission notes that each of the University's current alternative proposes a road pattern that differs from the current configuration. Specifically, Alternative B proposes to relocate McAllister Way to the center of the site; this would bring vehicular traffic around the east of the seasonal pond. To the extent that such a route was a thoughtful redirection in order to increase the habitat connectivity between Younger Lagoon and the large seasonal pond, such a route may be worth considering. In fact, a road configuration designed to limit activity near to Younger Lagoon may be worthy of pursuing. On the other hand, it appears that such a route would serve to fragment existing habitat and open space areas; thus, only if such a change can be demonstrated to fit into an overall circulation pattern that to protects resources, should it be considered.

The Commission is curious why Alternatives A & C propose only a partial removal of the current northern portion of McAllister Way. It appears that restoration of this area in order to enhance wildlife corridor values would be more appropriate. Also, it is unclear as to why Alternative C proposes a dead-end road at the first left-hand turn coming off of McAllister Way.

8. Coastal Act Priority Uses

Coastal Act Policies Applicable to Terrace Point

The issue identification submittal correctly recognizes that Coastal Act Sections 30213, 30220 to 30223, and 30250, addressing land use priorities, are applicable to Terrace Point. These policies state:

§ 30213: Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

§ 30220: Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

§ 30221: Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.

§ 30222: The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

§ 30222.5: Ocean front land that is suitable for coastal dependent aquaculture shall be protected for that use, and proposals for aquaculture facilities located on those sites shall be given priority, except over other coastal dependent developments or uses.

§ 30223: Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

§ 30250: (c) Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors.

§ 30255: Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. . When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.

Land Use Priority Issues Identified by the University

The Issue Identification submittal identifies the following issues, summarized below, on the subject of priority of land uses at Terrace Point:

- How do the Coastal Act policies giving coastal-dependent and coastal-related

development priority for siting here affect the LRDP?

- Would the provision of LML-related living and food service accommodations meet coastal-related standards?

Commission Comment Relative to Land Use Priorities at Terrace Point

The Commission notes that questions have arisen with regards to the appropriate types of uses that should and should not be pursued through the LRDP at this location (for example, housing). As a starting point, the types of use for the subject site need to be understood within the general context of previously permitted development at this location. When the Commission originally authorized the initial development of the Long Marine Laboratory facility in 1976 on lands heretofore used for agriculture, a Coastal Act priority use, it was only because the Lab was a coastal-dependent facility, another Coastal Act priority use, that needed to be located near to the ocean and in a remote, semi isolated area. The Commission specifically found that the facility would not adversely affect adjacent agricultural operations; and that limited public access was necessary in order to protect the environmentally sensitive lagoon and beach habitats.

At each juncture when the Lab expanded, and when California Department of Fish & Game and National Marine Fisheries Service were added to the mix, the Commission was careful to weigh the relative land-use priorities for these additional coastal-dependent/related developments versus the rural, agricultural lands that would be displaced. In each of these cases, it was largely due to the priority nature of the marine research facilities proposed that this transitional area at the edge of urban Santa Cruz was allowed to be converted to marine research facilities. These previous interpretations by the Commission hold true to this day.

When the University forwards its Long Range Development Plan (LRDP) to the Commission for review, it will be within the above discussed land use context that LRDP policies for types of uses will be evaluated. Regardless of Terrace Point's proximity to the urban areas of Santa Cruz, the Commission has found that the Terrace Point site is outside of the urban boundary. In addition, in light of past agricultural uses here, the Commission has only permitted the conversion of lands to marine research-educational uses because of their status as high priority uses under the Coastal Act. As such, each development type and/or use proposed under the LRDP will likewise be evaluated for its priority for siting here under the Coastal Act. On a similar note, California Code of Regulations (CCR) § 13513 requires that the University to identify uses of more than local importance within the LRDP; marine research facilities dependent upon seawater would qualify under this criteria.

Commission Comment Relative to Current Site Plan Alternatives

Each alternative proposes to locate residential uses at the northeast corner of the site. As Commission staff has previously stated, stand alone residential use at this location is not a priority use under the Coastal Act. As such, the University must provide further information and analysis on the relationship between any proposed residential uses and other existing and/or proposed coastal dependent and coastal related development types.

9. LRDP Implementation Measures

While the University's issue identification submittal correctly identifies the Coastal Act policies that are applicable to Terrace Point, it does not go into the detail necessary to address implementation of the Long Range Development Plan (LRDP). Once the Coastal Commission approves an LRDP for the site, the University will initially be responsible for ensuring that any future development is consistent with the LRDP. The California Code of Regulations contain some minimum standards for such a review procedure. Therefore, another issue that the University needs to explore is how it will ensure that this consistency happens. Some of these specific issues are:

1. How will the University ensure that its diverse staff in various departments both on campus and statewide follow the LRDP; e.g., Will an internal permit process be established? Will there be one staff position specifically assigned?
2. How will the University ensure that the notice requirements of California Code of Regulations (CCR) § 13549 are complied with?
3. How will the University ensure that projects are built according to agreed upon specifications? (e.g., Will there be some type of permit that has conditions or specifications? How will there be assurances that contractors follow these?)
4. There may be some projects that are undertaken by other agencies on the site (e.g. like the NMFS building was). Will the University assert control over these projects under the LRDP or will the Coastal Commission still do coastal permits or federal consistencies for those type of projects? Likewise, there may be projects that are undertaken by utility or similar providers (e.g., PG& E, City Water Department) that occur on the University property. Again, will the University through the LRDP assert some sort of review over these and, if so, how?
5. The LRDP is a blueprint for complete site development, which might not ever completely occur and which likely will not occur at one time. The LRDP will also have protective provisions such as showing areas that will not be developed. How will the University relate such protective measures to the development so that the end result is not, for example, construction of individual building envelopes with projects without the remainder of the site being landscaped or restored as provided under the LRDP? (This also relates to the issue as to whether the University intends to retain total ownership of the site and its buildings or intends to lease certain sites or buildings to others.)
6. There may be some activities that are undertaken that may appear to be minor and independent of any particular building project shown in the LRDP (e.g., installation of a fence; site grading) that are nonetheless defined as "development" under the Coastal Act. How will the University assure that these will receive scrutiny and proper notice? CCR Section 13549(d) does allow for certain developments to be the equivalent of being excluded, but the LRDP will have to specifically list these and mechanisms for implementation of an exclusion process.
7. There may also be emergency situations requiring expeditious corrective measures. How will the University see that these are authorized and ensure notice and coordination with any other affected agencies, as well as the Commission?

8. Previous permits have been issued covering developments on Terrace Point, including requirements for lagoon management, event limitations, and public access provision. These cannot be ignored or voided by the University unless there is specific language in the certified LRDP which indicates which requirements may be superceded by subsequent actions of the University in its implementation of the LRDP. How will the University ensure that these requirements remain effective and are implemented?

In light of the above, the final LRDP should be explicit as to the following:

1. Internal procedures for various identified University staff and departments to prepare and review development plans consistent with the LRDP;
2. Notice procedures and responsibilities consistent with CCR Section 13549;
3. Internal procedures for post-approval condition and construction review to ensure projects are constructed pursuant to approved specifications and remedies for any identified problems;
4. Identification of project types or land areas (e.g., easement areas) that are not under University jurisdiction and thus not subject to the University's LRDP review procedures.
5. Identification of mechanisms including easements, deed restrictions, CC&Rs, lease agreements, etc. to ensure that all site work, restoration, and protection is implemented.
6. Identification of minor development categories that can occur without following LRDP project approval process.
7. Identification of an emergency authorization process consistent with California Code of Regulations and the Coastal Act.
8. Listing of previous permits and condition requirements and incorporation of required management plans and other on-going condition obligations into the LRDP.

C. Next Steps

Now that the University has correctly identified Coastal Act policies applicable to Terrace Point, the next step in the planning process will include the preparation of a draft Long Range Development Plan (LRDP) and accompanying CEQA document. As the University drafts these documents, the Commission expects that the University will work with Commission staff under the provisions of Coastal Commission Regulations (CCR) § 13516 (Staff Review During Preparation). This Section states:

> *During the preparation of the LCP or LRDP, the local government or governing authority shall to the extent possible coordinate with and be assisted by Commission staff in resolving issues as to the conformity and sufficiency in meeting the requirements of the California Coastal Act of 1976. The executive director of the Commission may from time to time give non-binding informational opinions on such issues, based on staff interpretations of the Coastal Act and decisions of the Commission pursuant to Public Resources Code Section 30625(c).*

In addition to coordinating with Commission staff, the University may also seek the guidance of the Commission after it has completed a draft LRDP. This review by the Commission is provided for under CCR § 13517 (Preliminary Review by the Commission), and which states,

> *(a) In addition to any Commission review of the issue identification, the governing authority preparing the LCP or LRDP shall be entitled to at least one preliminary review by the Commission prior to formal submittal.*

If the University elects to solicit the Commission's input on the draft LRDP, then this will occur at the convenience of the Commission, with no vote or action taken.

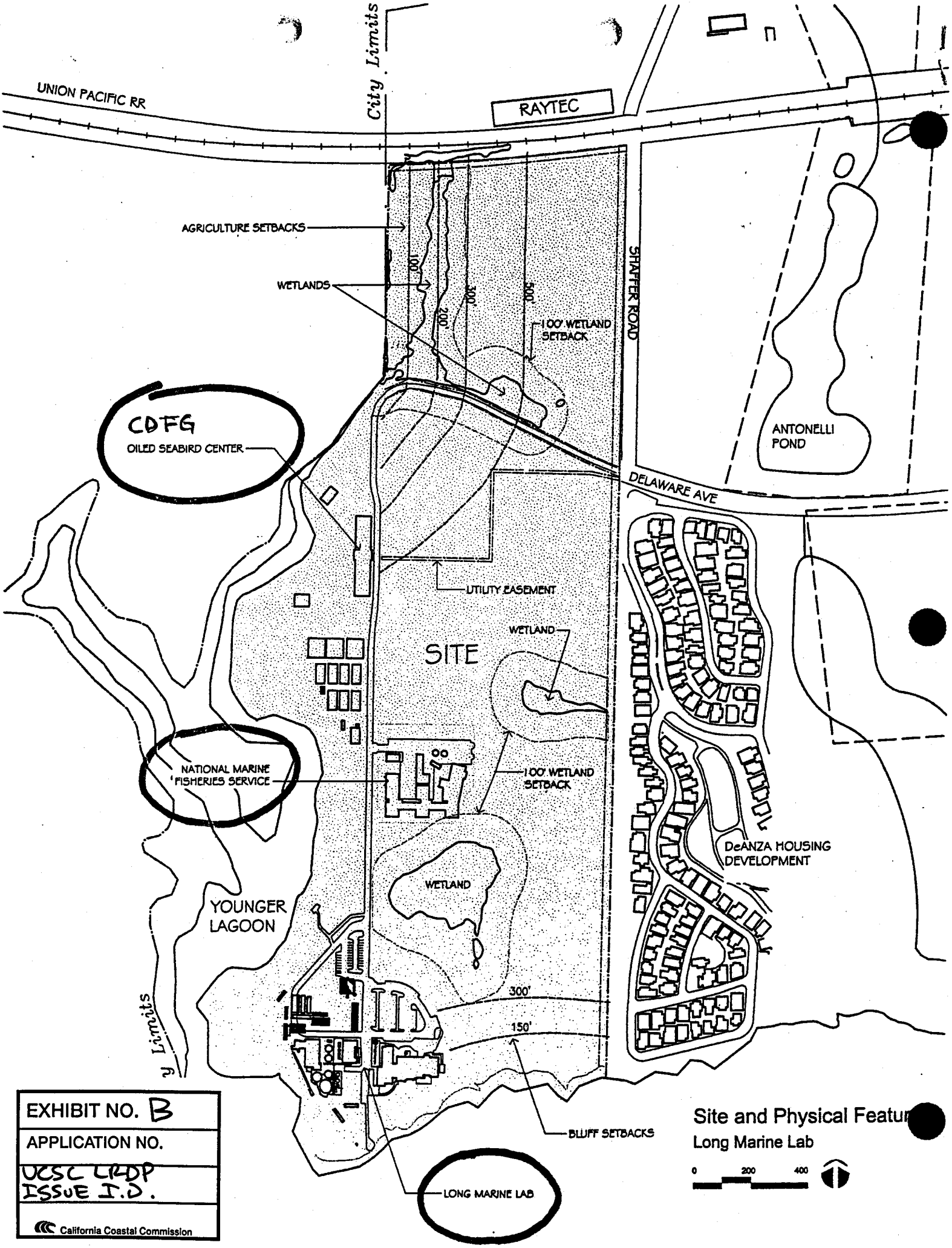
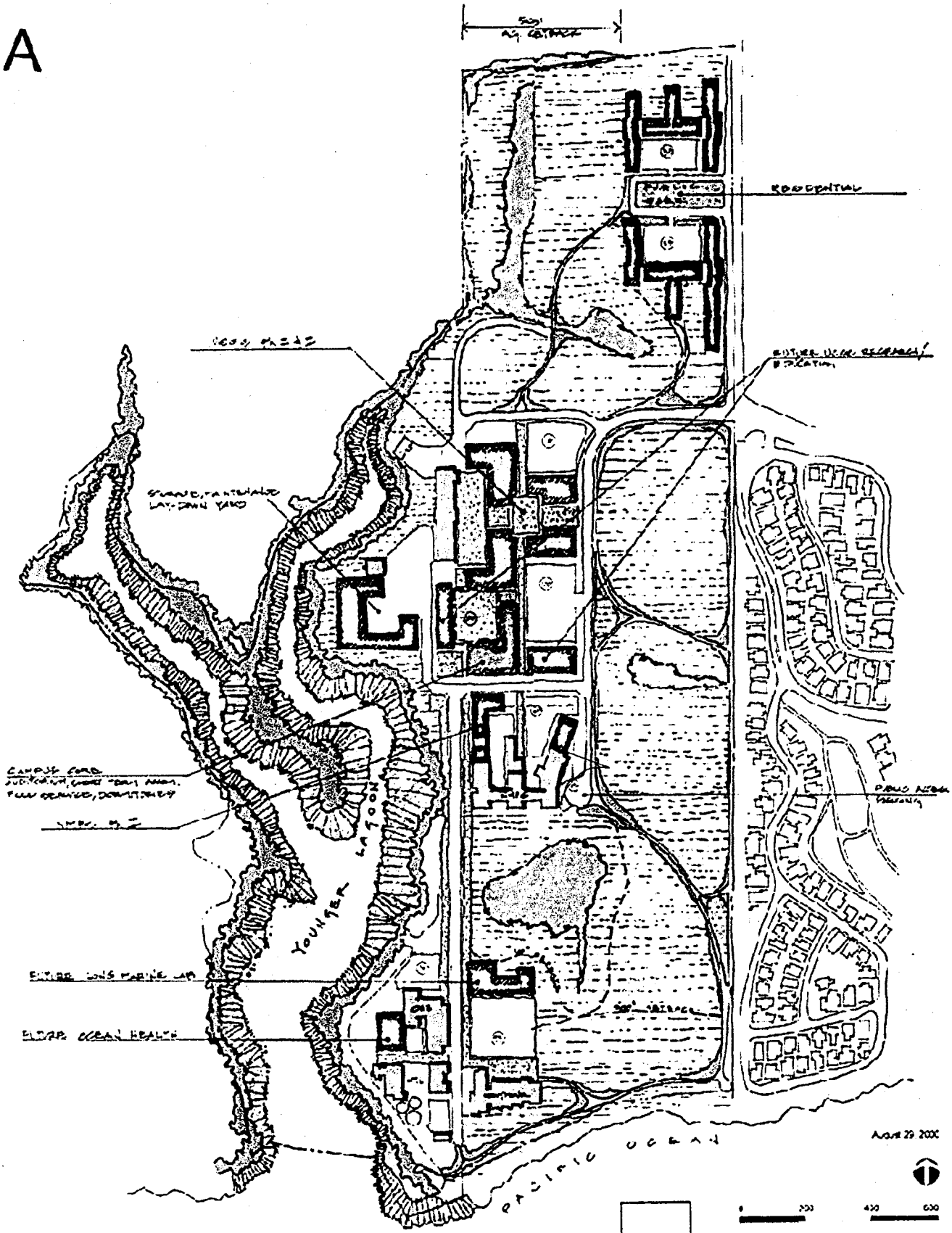


EXHIBIT NO. B
APPLICATION NO.
UCSC LRDP ISSUE I.D.
California Coastal Commission

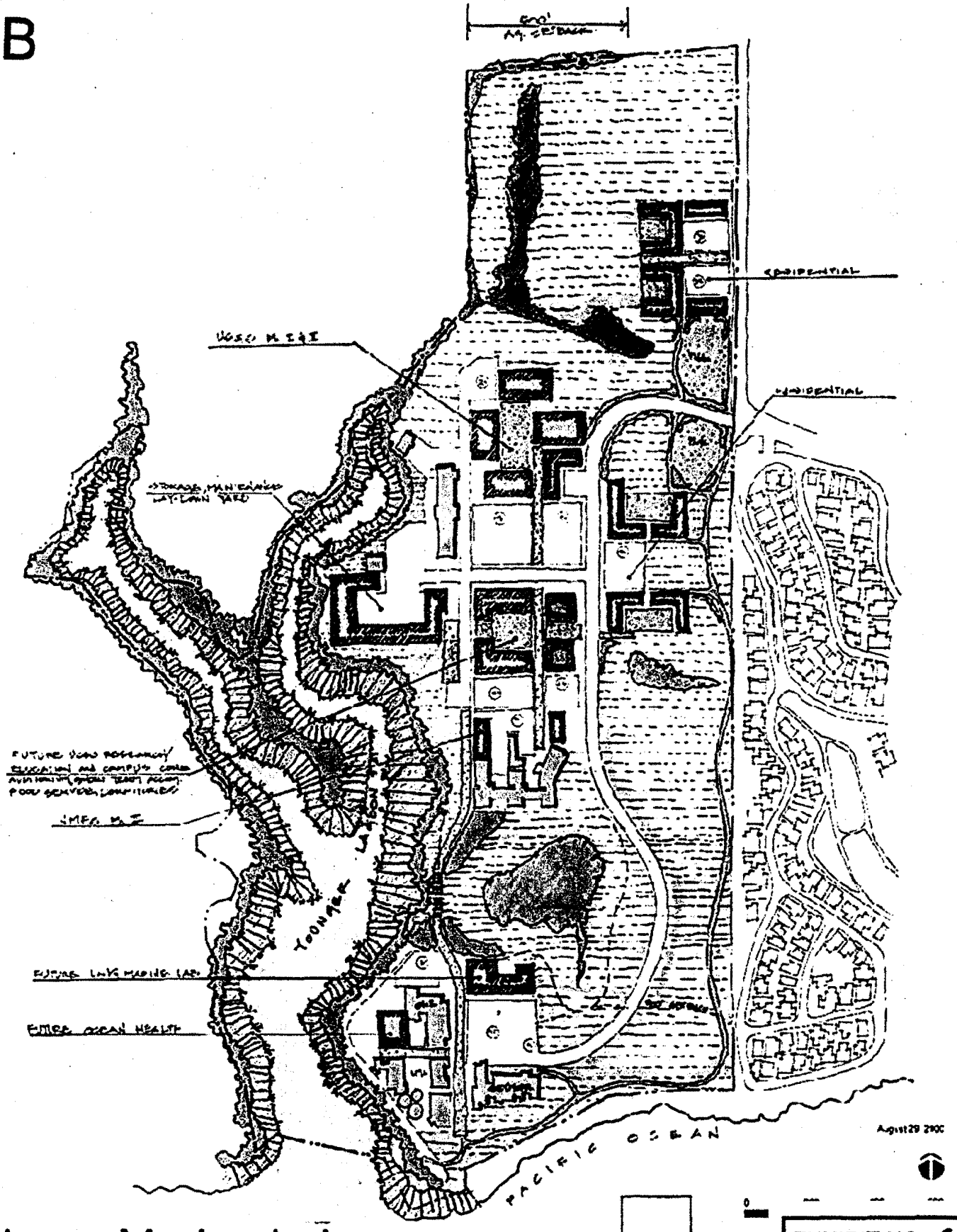
A



Long Marine Lab

EXHIBIT NO. C
APPLICATION NO.
UCSC LRDP ISSUE I.D.
California Coastal Commission

B



Long Marine Lab

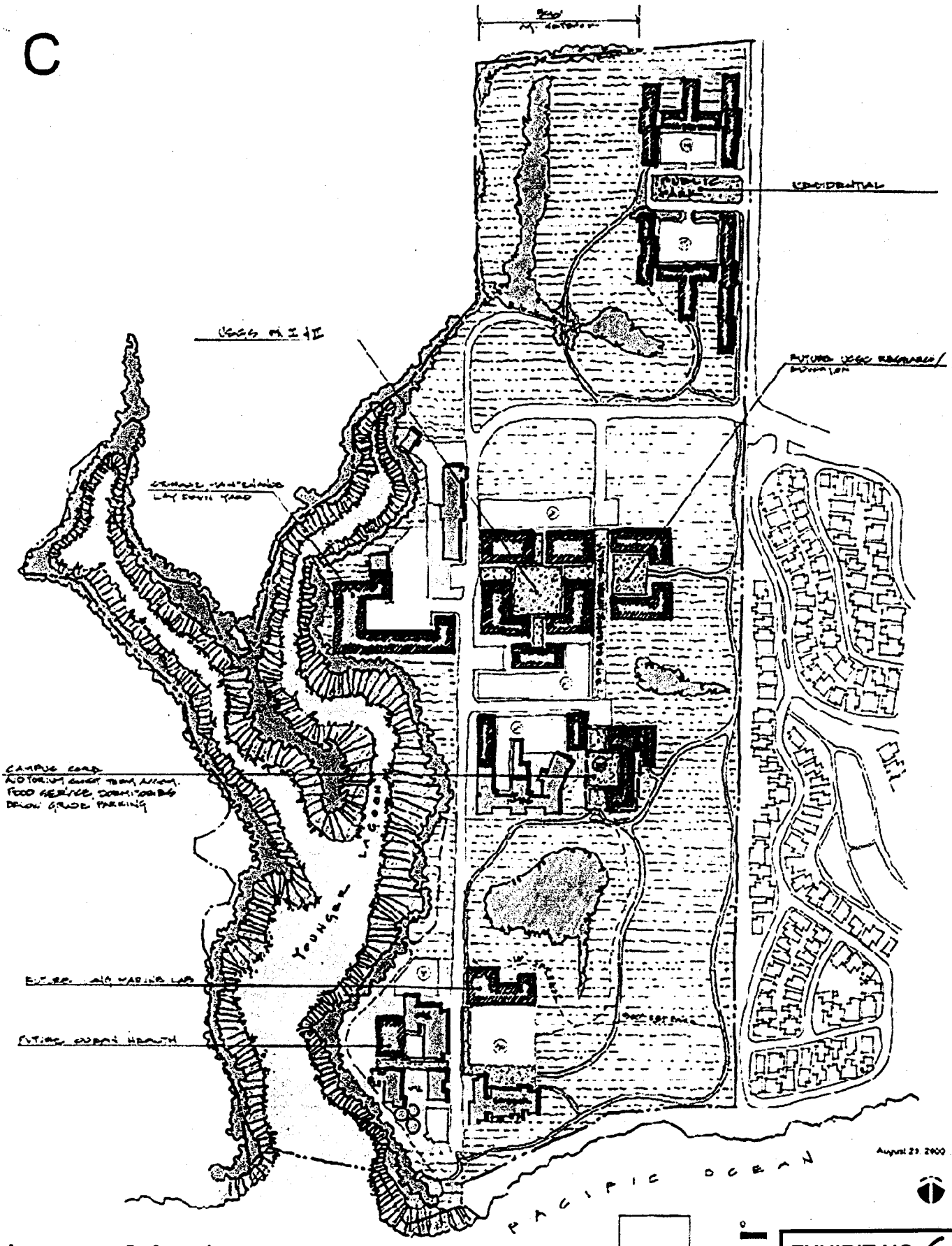
EXHIBIT NO. C

APPLICATION NO.

UCSC LRDP ISSUE I.D.

California Coastal Commission

C



Long Marine Lab

EXHIBIT NO. C
APPLICATION NO.
UCSC LRDP
ISSUE I.D.
California Coastal Commission

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PHYSICAL PLANNING AND CONSTRUCTION — SANTA CRUZ, CALIFORNIA 95064

TRANSMITTAL

DATE: November 2, 2000

TO: Interested Persons and Agencies

FROM: Charles Eadie, Director of Campus and Community Planning
University of California, Santa Cruz CE

SUBJECT: Issue Identification
Long Marine Laboratory, Coastal Long Range Development Plan

Pursuant to §13504 of the California Coastal Commission Regulations, the University of California Santa Cruz is transmitting copies of its issue identification report, including an outline of major tasks to be performed, for the proposed Long Marine Laboratory Coastal Long Range Development Plan. The outline of major tasks begins on the next page of this transmittal, and the issue identification report is enclosed separately.

The California Coastal Commission is currently reviewing these documents and has tentatively scheduled a public hearing on the issue identification report for its December 11 through 15, 2000 meeting at the Hyatt Regency in San Francisco. **The University of California will accept public comments on this document until the California Coastal Commission holds its public hearing on the matter, after which no public comment shall be accepted regarding the document.**

Please direct any questions and comments to:

Mr. Charles Eadie
Director of Campus and Community Planning
University of California
515 Swift Street
Santa Cruz, California 95060

831/460-3570
wiebe@cats.ucsc.edu

EXHIBIT A

UCSC LRDP
Issue
Identification

STATEMENT REGARDING MANNER IN WHICH THE UNIVERSITY OF CALIFORNIA INTENDS TO ADDRESS COASTAL PLANNING ISSUES

Outline of Major Tasks

Introduction

The overall approach to development of the Coastal Long Range Development Plan for Long Marine Laboratory begins with identifying site constraints and development issues through early consultation with interested persons and agencies and review of existing information. Based on this consultation, and in light of broad program objectives for the Marine Research and Education Center at Long Marine Laboratory as well as Coastal Act policies, the University of California will consider various approaches to site planning, undertake additional analysis of site constraints, formulate a draft plan, analyze impacts, mitigation measures, and plan alternatives in an environmental impact report, and ultimately adopt a Coastal Long Range Development Plan (LRDP). This plan will then be forwarded to the California Coastal Commission for its consideration.

The outline below summarizes the major tasks involved in this process. While a general sequence to events is represented in the outline, there is considerable overlap. For example, consultation on issues and reference to existing literature will take place throughout the process. In this regard, the following is intended as a schematic of the process.

I. Review of Existing Plans and Literature

The purpose of this task is to learn as much as possible from previous work completed for the project site. Relevant sources include, but are not limited to, the following:

- ✓ Previous draft and final environmental impact reports and project plans from Terrace Point,
- ✓ University of California Santa Cruz Institute of Marine Sciences Long Marine Laboratory Master Plan,
- ✓ Final Environmental Impact Report for Long Marine Laboratory Master Plan,
- ✓ City of Santa Cruz Local Coastal Program,
- ✓ County of Santa Cruz Local Coastal Program and background material,
- ✓ Historical planning documents related to the area, and
- ✓ Prior California Coastal Commission actions affecting the site.

II. Issue Identification and Analysis

The University of California has undertaken an extensive process of issue identification culminating in the publication of the Issue Identification report and this outline of major tasks. The University of California has built on the volumes of environmental analysis completed for the project site in the last few years. In order to update knowledge of site constraints and focus it on issues specific to the

LRDP, additional analysis is underway and will be ongoing throughout the planning and environmental impact report process. Major efforts (past, underway and contemplated) include, but are not limited to: identification of location and scope of, and appropriate protections for environmentally sensitive habitat areas; consultation with wildlife agencies concerning appropriate protections for sensitive species; assessment of visual impacts of planning alternatives, including use of computer modeling; assessment of soil and geologic constraints; formulation of hydrologic and drainage approaches consistent with resource constraints; assessment of potential effects on adjacent agriculture, including literature review concerning appropriate buffering standards; identification of known cultural resources and potential sites for other cultural resources; assessment of opportunities and limitations affecting potential use of the area for public access to the coast and coastal recreational activities; coordination to address concerns of nearby residential neighborhoods; and continuing consultation with local governments to address issues such as extension of public services, provision of on-site residential accommodations, and overall coordination.

Another essential part of the early process is the identification of broad program objectives for the short and long-term development of the Marine Research and Education Center at Long Marine Laboratory. These program objectives have been discussed in focus groups and in community workshops.

III. Early Outreach

The University of California has conducted extensive early outreach for the project. Efforts included the creation of a planning committee in fall 1999 consisting of University of California campus members, University of California staff, local government representatives, Coastal Commission representatives, and experts as appropriate. This committee meets on a regular basis to examine and evaluate issues that develop during the course of the planning process.

The University of California is also conducting numerous focus groups to identify and discuss issues. Meetings have been held to discuss agricultural interests, environmental issues, neighborhood concerns, park and recreational opportunities, land preservation, and other concerns.

Finally, the University of California is conducting community-wide workshops to identify issues and discuss plan concepts. These workshops began in spring 2000 and officials expect to conclude them by spring of 2001.

IV. Plan Development

This task involves the development of alternatives that will meet program objectives and respond to identified Coastal Act issues and site constraints. Ultimately, a preferred approach will become the basis for preparation of a draft Coastal Long Range Development Plan, and a range of alternatives will be evaluated by the environmental impact report. A Draft Coastal Long Range Development Plan is expected to be published in early 2001.

V. Preparation of Environmental Impact Report (EIR)

The University of California will prepare an environmental impact report (EIR) for the Coastal LRDP. This process includes a Notice of Preparation, a public scoping session, consultation with interested agencies, identification of feasible alternatives, environmental analysis of all alternatives, identification of environmental impacts and mitigation measures, preparation of a Draft EIR, a public hearing on the Draft EIR, response to comments, and the preparation of a Final EIR.

VI. Review by University of California Regents

The University of California Regents will conduct one or more public hearings on the Draft Coastal Long Range Development Plan and the Final EIR by the end of 2001 or the beginning of 2002. At that time, the UC Regents will consider certification of the Final EIR and approval of the Coastal Long Range Development Plan.

VII. Review by California Coastal Commission

The University of California is conducting on-going consultation with the California Coastal Commission staff. The California Coastal Commission will consider the Issue Identification report at an upcoming hearing, possibly in December 2000. If the Regents approve the Coastal Long Range Development Plan, the plan will be forwarded to the California Coastal Commission for its formal consideration.

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PHYSICAL PLANNING AND CONSTRUCTION

SANTA CRUZ, CALIFORNIA 95064

RECEIVED

OCT 10 2000

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

October 6, 2000

Ms. Tami Grove
Deputy Director
California Coastal Commission
725 Front St. Suite 300
Santa Cruz, CA 95060

Dear Tami:

As you know, consistent with the expressed interest of the California Coastal Commission, the University has elected to prepare a Coastal Long Range Development Plan (CLRDP) for the Long Marine Laboratory, a process which we began almost a year ago. As requested by your staff we are pleased to submit the attached Issue Identification analysis.

A great deal of time and care has gone into the preparation of this document, and we hope that the effort will prove useful in expediting the consideration and resolution of coastal issues that will be addressed in the CLRDP.

It is also our goal that the CLRDP, when adopted, will provide the certainty and framework by which future projects can be approved by the University with the concurrence of the Coastal Commission and staff.

We appreciate your willingness to meet with us regularly throughout the process. Moreover, we hope that our planning together will reinforce the mutuality or our respective missions. We believe that the goals of the University in developing a world class marine science education and research center support the goals of the state of California in understanding, utilizing and protecting coastal resources to better understand and plan for the future of our coastal and marine environment.

We understand now with this submittal that the Issue Identification will be brought to the Coastal Commission within 60 days. Please confirm the probable meeting schedule at your earliest convenience. Should you have any questions regarding this information, please do not hesitate to call either of us.

Sincerely,

Gary Griggs by H.F.

Gary Griggs, Director
UCSC Institute of Marine Sciences
(831) 459-2464

Charles Eadie, Director
UCSC Campus/Community Planning
(831) 460-3572

cc: Mary Hudson

EXHIBIT A

UCSC LRDP
Issue
Identification

UC Santa Cruz
Long Marine Laboratory
Coastal Long Range Development Plan
Santa Cruz, California

California Coastal Act Consistency Issue Identification

Prepared by
University of California Santa Cruz

In association with
BMS Design Group
Mary L. Hudson, Attorney
John A. Gilchrist & Associates

October 4, 2000

THE LONG MARINE LABORATORY

Overview

The University of California Santa Cruz (UCSC) has embarked on the preparation of a Coastal Long Range Development Plan (CLRDP) to establish a marine research and education center at the Long Marine Laboratory within the City of Santa Cruz. Development at the Long Marine Laboratory will enable the Institute of Marine Sciences at UCSC to build a premier institution located directly on Monterey Bay to address issues of local and global concern regarding the health and productivity of the oceans.

Over the past decade the Institute of Marine Sciences has focused its efforts in three directions. First, assisting in the development of excellent academic programs and outstanding marine instrumentation facilities. Second, developing partnerships and collaborations with state and federal marine agency programs and the private sector to strengthen existing programs and expand the capabilities of the University at a time when University resources have been limited. And third, developing public education and policy related programs to compliment and fully utilize the marine research capabilities and resources and share the results of the research with the public at large and decision makers at all levels. Current partners of UCSC at the Long Marine Laboratory include:

- The National Marine Fisheries Service

- The United States Geological Survey
- The California Department of Fish and Game, and
- The Nature Conservancy

Land Resources and Existing Facilities

The complex of facilities and natural resources is located on approximately 102 contiguous acres. UC owns and manages the Younger Lagoon Reserve located at the western edge of the Marine Education and Research Center. Adjacent to this Reserve the Long Marine Laboratory complex has accommodated the needs of the Institute for the first twenty years of operation. In 1999, the adjacent property was acquired by the UC Regents to accommodate the future needs of the Marine Education and Research Center. The total properties included in the LRDP are:

- 26 acre Younger Lagoon Reserve
- 16 acre Long Marine Laboratory complex and
- 60 acre Upland site (Terrace Point)

102 acres Total

Younger Lagoon Natural Reserve (YLNR). The 26 acre Younger Lagoon is currently included in the University's Natural Reserve System and managed as a habitat preserve for permanent protection. The Lagoon has met the stringent requirements of the UC Reserve System for habitat value and appropriateness for research and educational activities and has been accepted into a select group of properties, statewide, that are managed by the University Natural Reserve System. The lands to the north and west of the Younger Lagoon are prime agricultural lands currently in agricultural production. The lands immediately to the east are improved with the Long Marine Laboratory complex.

Long Marine Laboratory (LML). The 16-acre Long Marine Laboratory is located at the coastal bluff separated from the Younger Lagoon by an earth berm. The twenty-two year-old Laboratory is situated above the seawater intake system that brings seawater up to the research complex. The Long Marine Laboratory is the core of the UC research facilities. Under construction at the Lab is the Center for Ocean Health facility.

60 Upland Acres. The adjacent 60 upland acres extend the University property along the coastal bluff for an additional 850 feet. The 60 acres once were agricultural lands and produced brussels sprouts until 1987. Since then, the property has lain fallow. The recently completed Seymour Discovery Center is located on a portion of this property, adjacent to the Long Marine Laboratory. In addition, the National Marine Fisheries Service is currently constructing laboratories and offices on a 2.5-acre parcel within this property. Both facilities are connected to the seawater intake system. Fresh water wetlands have been identified on the property, a portion of which were formerly tributary to the Younger Lagoon. The property is bounded on

the north by the Union Pacific Railroad and the adjacent Raytec R&D development and bounded on the east by the De Anza mobile home park.

Existing Facilities. The Long Marine laboratory complex is currently developed with 127,400 SF of research and educational facilities operated by UC or its affiliates. The facilities include:

- 13,000 SF Long Marine Laboratory
- 23,000 SF Center for Ocean Health
- 18,000 SF Oiled Wildlife Center
- 20,000 SF Seymour Marine Discovery Center and
- 53,400 SF National Marine Fisheries Service Laboratory

127,400 SF Total

Consistency with the Coastal Act

The Pursuant to the California Coastal Commission Regulations Section 13503, a first step in the preparation of an LRDP is the identification of issues to facilitate a review for consistency with the California Coastal Act. The issues are organized around the applicable policies in the Coastal Act (section 30200 et. al.) The policies are grouped around: Public Access, Recreation, Marine Environment, Land Resources, and Development. Each policy group is followed by a discussion of the existing context and by an identification of issues. The correlation between the issues and the relevant Coastal Act policies is summarized in a matrix at the end of this document.

PUBLIC ACCESS

Applicable Policies

30210. Access, Recreational Opportunities, Posting. *In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights of private property owners, and natural resource areas from overuse.*

30211. Access to the Sea. *Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

30212 (a). Access from Public Roadway. *Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: .*

(1) It is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,
(2) Adequate access exists nearby, or,
(3) Agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.

30212 (c). No Restrictions to Public Access. *Nothing in this division shall restrict public access nor shall it excuse the performance of duties and responsibilities of public agencies which ar required by Sections 66478.1 to 66478.14, inclusive, of the Government Code and by section 4 of article X of the California Constitution.*

30212.5. Public Parking. *Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.*

30213. Lower Cost Visitor and Recreational Facilities. *Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.*

30214 (a). Regulation of Public Access. *The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:*

(1) Topographic and geologic site characteristics.
(2) The capacity of the site to sustain use and at what level of intensity.
(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.
(4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.

30214 (b). Balancing of Rights. *It is the intent of the Legislature that the public access policies of this article be carried out in a reasonable manner that considers the equities and that balances the rights of the individual property owner with the public's constitutional right of access pursuant to Section 4 of Article X of the California Constitution. Nothing in this section or any amendment thereto shall be construed as a limitation on the rights guaranteed to the public under Section 4 of Article X of the California Constitution.*

30214 (c). Innovative Techniques. *In carrying out the public access policies of this article, the commission and any other responsible public agency shall consider and encourage the utilization of innovative access management techniques, including, but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.*

30252. Services for Public Access and Recreational Facilities. *(See section on Development for further issue discussion.) The location and amount of new development should maintain and enhance public access to the coast by:*

(1) facilitating the provision or extension of transit service,
(2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads,
(3) providing non-automobile circulation within the development,
(4) providing adequate parking facilities or providing substitute means of serving the development with public transportation,
(5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by
(6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Context

The lands that comprise the Long Marine Laboratory LRDP are bordered on the south by a steep bluff and open ocean, and on the west by bluffs leading to Younger Lagoon. The site includes natural resources, specialized marine-oriented research facilities and public educational facilities open to broad public visitation.

Seymour Discovery Center. The Seymour Discovery Center provides a significant educational and recreation-oriented visitor-serving facility. The Center is open during the week as well as on weekends and is staffed by university staff and volunteer docents. The Center has achieved a remarkable success in reaching a wide audience including school-age children in meeting its mission of promoting an understanding and respect for the marine environment.

Bluff-Top Access. In the bluff-top area, access is managed by the University and provided by regular educational programs sponsored by the Seymour Discovery Center. The center provides docent led tours to the top of the bluff overlooking the entire Monterey Bay and to an overlook into Younger Lagoon and the marine mammal research area. In connection with a coastal permit for the Center for Ocean Health, in 1999 the Coastal Commission asked the University to prepare an interim public access plan pending completion of the LRDP. While the interim plan is

undergoing review, provision has been made informally for public access across the bluff and along the bluff edge. In addition, informal access is enjoyed by the public along the boundary with De Anza mobile home park. This route provides longitudinal access from the end of Delaware Avenue to the top of the coastal bluffs. Some surfers currently use this route to gain access down the coastal bluff to the shoreline below.

Younger Lagoon Natural Reserve Access. For the YLNR area, in 1981, the Coastal Commission approved a Management Plan that limits public access in order to protect the lagoon's long-term habitat value and value as a natural preserve and research resource. More recently, the Coastal Commission has requested an update to that Management Plan and that update is undergoing Commission review at this time.

Transit Access. Recently, Long Marine Laboratory was connected via shuttle bus to the main campus on a trial basis. With increased demand for trips between the main campus and LML, the viability of shuttle bus connections is increased. An existing Santa Cruz Metropolitan Transit District (SCMTD) bus route currently serves the gateway of the site. Route 3B provides service between the site and downtown Santa Cruz via Mission Street and Delaware Avenue.

Issues

The key public access issues involve:

- **Younger Lagoon Protection.** How shall the interest in public access to the coast be balanced with resource protection requirements in the management of the YLNR?

- **Lab Security.** How shall public access be provided while maintaining the security and safety requirements of the laboratories and their associated equipment and infrastructure, including the seawater intake?

- **Coastal Bluff Access.** How shall public access to and along the coastal bluffs be incorporated while providing for the safety of the public and protection of native vegetation? (See section on Land Resources.) Is public access to the foot of the bluff feasible and can it be provided consistent with public safety?

- **Historic Use.** What is the location and nature of any historic accessways to the sea?

- **Parking.** What is the appropriate location and amount of public parking for coastal access?

- **Signage.** What is the appropriate signage for public access?

- **Management.** What measures will assure suitable on-going management of public accessways on the site?

- **Public Access Services and Recreation Facilities.** Can public access to the coast be enhanced by provisions such as: (1) augmenting UCSC shuttle system service and SCMTD service to the site, (2) providing appropriate on-site parking for public access to the coastal portions of the property, (3) providing suitable recreational opportunities for those who work or live at the Center so that they do not overburden public coastal resources, and (4) incorporating a bicycle circulation system into the development plan to serve both visitors and employees ?

RECREATION

Applicable Policies

30220. Water-oriented recreation. *Coast areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.*

30221. Demand for Recreation. *Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.*

30222. Priority for Agriculture or coastal-dependent Industry. *The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.*

30222.5. Aquaculture. *Ocean front land that is suitable for coastal dependent aquaculture shall be protected for that use, and proposals for aquaculture facilities located on those sites shall be given priority, except over other coastal dependent developments or uses.*

30223. Upland Support. *Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.*

Context

Existing Nearby Recreation Opportunities. The nearest formal access to water-oriented recreational activities is at Natural Bridges State Park (1/4 mile to the east) and at Wilder Ranch

State Park (.5 miles to the west). The nearest commercial recreational uses providing overnight lodging are concentrated along Mission Street (1/2 mile to the north). Water-oriented recreational facilities providing easy and safe public access include those located along West Cliff Drive, at the Wharf, along Beach Street. Lighthouse Point is the geographic feature that defines the northern end of Monterey Bay. The point projects markedly into the Pacific Ocean, creating a prime surfing point (called Steamer Lane), located to the east of Lighthouse Pont and approximately 2.2 miles to the east of Long Marine Laboratory. The primary surfing areas in near proximity to the Long Marine Laboratory include: West Cliff Drive beaches, Natural Bridges and pocket beaches on the north coast.

Suitability for Water Access. The Long Marine Laboratory lies on a coastal bluff approximately 35 feet above the rocky shoreline. The Santa Cruz LCP map designates the southern shoreline area of Terrace Point as "coastal recreation." The shoreline is not suitable for recreational boating because of rough water on the exposed southern shore and sensitive biological resources in the sheltered waters of the lagoon. The steep bluff bars safe transport of small boats from upland areas down to the beach. The shoreline along the property's southern perimeter has been used for surfing, with some surfers gaining access to the area across the upland and down the face of the bluff.

Issues

The key issues involving the protection of recreational opportunities along the coast are:

- **Use of shoreline for surfing activities.** Can upland and bluff areas be feasibly committed to providing access to surfing areas? Can provision be made for recreational use of the shoreline consistent while protecting the biological resources of Younger Lagoon? Is the present and foreseeable future demand for surfing sites already provided for in the area?

- **Recreational-educational opportunities.** What recreational-educational opportunities can be provided in conjunction with LML activities consistent with constraints of safety, funding, and university program demands?

MARINE ENVIRONMENT

Applicable Policies

30230. Marine Resource Protection. *Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a*

manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

30231. Biological Productivity. *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

30232. Hazardous Materials. *Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.*

30233 (a). Diking, Filling, or Dredging of Wetlands. *The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:*

(3) In wetland areas only, entrance channels for new and expanded boating facilties.

(5) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

(7) Restoration purposes.

(8) Nature study, aquaculture, or similar resource dependent activities.

30233 (c). Enhance the Functional Capacity of the Wetland or Estuary. *In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary. Any alteration of coastal wetlands identified by the Department of fish and Game ... shall be limited to very minor incidental public facilities, restorative measures, nature study ... if otherwise in accordance with this division.*

30233 (d). Erosion Control and Flood Control Facilities. *Erosion control and flood control facilities constructed on water courses can impede the movement of sediment and nutrients which would otherwise be carried by storm runoff into coastal waters. To facilitate the continued delivery of these sediments to the littoral zone, whenever feasible, the material removed from these facilities may be placed at appropriate points on the shoreline in accordance with other applicable provisions of this division, where feasible mitigation measures have been provided to minimize adverse environmental effects. Aspects that shall be considered before issuing a coastal development permit for such purposes are the method of placement, time of year of placement, and sensitivity of the placement area.*

30235. Revetments, Breakwaters, Groins, Harbor Channels, Seawalls, Cliff Retaining Walls. *Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fish kills should be phased out or upgraded where feasible.*

30240 (a). Protection of Sensitive Habitat. *Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (See also section on Land Resources.)*

30240 (b). Development Adjacent to Sensitive Habitat. *Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas. (See also section on Land Resources.)*

Context

The vision for the Marine Education and Research Center at the Long Marine Laboratory embraces the protection objectives for the marine environment that are imbedded in the California Coastal Act. Development at the Long Marine Laboratory will permit UCSC to host a wide range of collaborative educational and scientific efforts whose pursuit will enhance these common objectives.

Younger Lagoon Hydrology. The 140-acre Younger Lagoon watershed drains largely undeveloped hillsides and agricultural lands to the north and west of the Long Marine Laboratory. Rain and agricultural runoff are primary inflow sources, (Strelow Consulting, *Draft EIR for the Santa Cruz Coastal Marine Research Center at Terrace Point,* April 1997.) During most of the year, the action of ocean waves and littoral drift promotes the development of a

barrier beach at the lagoon outlet. The beach and a bedrock shelf below the beach inhibit salt and fresh water movement in and out of the Lagoon. However tidal exchange does occur during winter months creating brackish conditions in the lower lagoon.

Younger Lagoon Natural Reaserve Biotic Resources. Younger Lagoon and the nearby Antonelli Pond are considered environmentally sensitive areas under Coastal Act definitions.

The YLNR and its associated habitats are of high importance for wildlife. Coastal lagoons and associated wetlands of the central California coast are well-known for their importance to migratory birds, and Younger Lagoon is one of the few remaining natural coastal wetlands in Santa Cruz County. The value of the YLNR is underscored by the great diversity of bird species known or expected to occur (198 species, excluding oceanic birds). The Reserve is especially important for migratory waterbirds, shorebirds, and raptors. Eighty-seven species of waterbirds and shorebirds, and sixteen raptor species have been recorded.

The close proximity of the lagoon to the Monterey Bay contributes to wildlife use of the lagoon; many birds that forage on the Bay and along the shoreline also use the lagoon to bathe, rest and forage. Productive mud and sand substrates of the lagoon support benthic invertebrates, providing food for a variety of shorebirds. The deeper portions of the lagoon offer foraging habitat for grebes and diving ducks. Shallow, near-shore waters are used by shorebirds, dabbling ducks, herons, and egrets. Shorebirds and ducks frequently move between the lagoon and the seasonal pond on the Terrace Point site during the winter and spring, when the pond is flooded.

In addition to the aquatic habitat, the YLNR supports habitats associated with communities of: salt marsh; freshwater marsh and herbaceous riparian; central coast arroyo willow riparian; coyote brush scrub; coastal sand dune, coastal dune scrub and coastal bluff scrub; coastal bluff and rocky shoreline; and sandy beach. (Summarized from the *UC Long Marine Laboratory Biotic Assessment,* The Habitat Restoration Group, 1993.)

Younger Lagoon is home to a large diversity of wildlife species that breed, forage or rest in the wide variety of plant habitats. Several plant species and a number of wildlife species are listed as sensitive (rare, threatened, endangered, state species of concern or locally unique). Due to the sensitivity of this natural system, there are no public access trails into the lagoon or along its edge. However, there are several public access overlooks on the east side of the Lagoon so that the public can see the Lagoon and view wildlife from a distance without disturbance. The Lagoon Reserve is available for UC teaching and research purposes, but permission for access is granted after receipt of a research or teaching plan, so that any wildlife disturbance can be prevented. Younger Lagoon Natural Reserve staff is very concerned about unauthorized public access into the Lagoon due to the potential for impacts to wildlife, particularly on avifaunal breeding, feeding and resting. Disturbance to may species will result in abandonment of the Younger Lagoon

ecosystem entirely. (M. Fusari. UCSC Natural Reserve Coordinator, personal communication, 2000.)

Coastal Terrace. The coastal terrace on which the Long Marine Laboratory is located is essentially flat, having less than 1% slope in most areas and maximum slope of less than 2%. Drainage is generally poor, and much of the site is subject to saturated soil conditions and temporary shallow inundation. Rainwater leaves the site primarily through evaporation, evapotranspiration, and seepage zones at the ocean cliff and at steep slopes above Younger Lagoon. Portions of the site drain into Younger Lagoon, to De Anza mobile home park, or directly to the Pacific Ocean. (Strelow, 1997)

Seasonal Wetlands and Ponds. A wetland delineation was conducted in 1997 (prior to UC ownership of the property) which indicated that seasonal wetlands occur on several parts of the property. This delineation replaced an earlier delineation that was done in 1993 and is valid for five years (expires 2002) under regulations of the Army Corps of Engineers, unless there is evidence of significantly changed conditions.

A 1.7-acre seasonal pond is located between the National Marine Fisheries Service facility and the Seymour Marine Discovery Center. This pond is a topographic depression that supports a variety of waterfowl and shorebird species. A 0.34-acre seasonal wetland is located near the east property boundary and associated with a partially collapsed culvert under De Anza mobile home park. A 2-acre seasonal wet meadow occurs along the McAllister access road and in a topographic depression on the north portion of the site. This wetland drains into a small channel that flows into Younger Lagoon. A small willow riparian and associated seasonal wetland, located just north of the CDFG Oiled Wildlife Center, also drains into this northeast arm of Younger Lagoon. The seasonal drainage leading into upper Younger Lagoon is also a wetland comprised of herbaceous riparian and willow riparian plant species. Other than the 1.7-acre seasonal pond, and the seasonal drainage feeding Younger Lagoon, wetlands on the site have little or no wildlife value.

In the course of public review of a previous specific plan proposal that was under consideration by the City (prepared by previous owners of the property) questions were raised about the differences between the 1997 and 1993 delineations.

In October 1997 the Coastal Commission staff and their biologist from the Department of Fish and Game reviewed the 1997 wetland delineation and agreed that it accurately reflected the extent of wetlands on the site. More recently, Coastal Commission staff requested a second review of site wetlands; therefore in mid-September 2000 UCSC wetland consultants met with Coastal Commission staff and their San Francisco biologist to assess whether site conditions have changed. Based on this review, it is the opinion of the University biologist that on-site conditions are consistent with the 1997 delineation.

Special Status Plant Species. Five rare, threatened, or endangered plant species are known to occur in the LRDP region. However, no special status plant species or suitable onsite habitat for these species was observed during field surveys conducted in 1993 and 1994. The overall condition of the onsite non-native grassland is poor, and the botanical value is low as a result of past agricultural use and invasion by non-native species. Plant species of concern (California Department of Fish & Game designation) potentially occurring in the vicinity were determined to be unlikely to occur onsite due to degraded conditions (The Habitat Restoration Group, March 1996).

Special Status Wildlife Species. Three special status species either have been documented or have the potential to occur on the Long Marine Laboratory site. These include the California red-legged frog, northern harrier and peregrine falcon. (The peregrine falcon was recently delisted by the US Fish and Wildlife Service but remains on California's sensitive species' list.) Other species such as the black swift and California brown pelican occur in the vicinity of the site.

Site surveys in 1992 and 1993 found no red-legged frogs on the LML property. However, during a survey in March 1997, one sub-adult frog was sighted in a shallow pond on the UPRR property, adjacent northerly boundary of the LML site. Red-legged frogs were also documented in farm ponds and at Wilder Ranch State Park within one mile of the site (B. Mori, Terrace Point California Red-legged Frog Assessment, 1997). Additional surveys later in 1997 and in 1998 (Mori, 1997; Bulger 1998) found no red-legged frogs. Wetlands on the site do not appear to provide breeding habitat for red-legged frog (Mori, 1997; Bulger 1998), although red-legged frog movement in an east-west direction may occur through the northern sector of the property (Zippin, memo to D. Pereksta, USFWS, 1998). The University is planning additional site surveys for red-legged frog in 2001 (C. Aldecoa, personal communication, 2000).

Northern harriers may nest in Younger Lagoon, and may have attempted to nest on the 60-acre Terrace Point site in the early 1990's. However due to existing development and recreational use (including leashed and unleashed dogs) on the Terrace Point site, nesting habitat is marginal to unsuitable. There have been no direct or indirect evidence of nesting on the site since 1992 (B. Mori correspondence to J. Gilchrist, 1998).

Peregrine falcons may forage on the ~40 acre ruderal grassland terrace. However because falcons typically forage over very large areas (125 square miles), loss of a portion of this grassland would not affect this species. Foraging habitat at Younger Lagoon would not be affected by development on the LML site.

Sensitive Habitat Areas. Sensitive habitats are defined by local, state, or federal agencies as those habitats that support special status species, provide important habitat values for wildlife, represent areas of unusual or regionally restricted habitat types, and/or provide high biological

diversity. Generally wetlands and riparian communities are considered sensitive habitat due to their value to wildlife, limited distribution, and decreasing acreage statewide.

The on-site seasonal pond and riparian channel above Younger Lagoon are considered sensitive habitats. The other onsite wetlands meet City, Coastal Commission and U.S. Army Corps of Engineers definitions, but do not provide significant biological or hydrological functions and values (The Habitat Restoration Group, March 1994).

Development Potentially Affecting Wetlands and Coastal Waters. No development under consideration in connection with the LRDP would involve diking, filling, or dredging of wetlands or coastal waters.

Issues

The key issues concerning protection of marine resources are:

- **Biotic Resources of Lagoon.** What development siting criteria and controls and resource management measures are necessary to protect the biotic resources and habitat values of Younger Lagoon?

- **Habitat Value of Upland Wetland Resources.** What is the actual habitat value of existing wetland areas? What development and management measures can be incorporated that will effectively and appropriately protect and enhance the existing upland wetlands?

- **Sensitive Habitat Protection.** Does sensitive habitat exist on the site other than the lagoon and wetlands, and can development control measures, buffers and design guidelines and management measures protect and such sensitive habitats?

- **Protected Species Habitat Management.** What are the appropriate management measures to maintain the habitat for protected species on site?

- **Biological Productivity and Quality of Coastal Waters.** What standards and practices are necessary to assure that development and use of the Center do not adversely affect the biological productivity or quality of adjacent coastal waters?

- **Erosion and Sedimentation Controls.** What are the appropriate design and operation parameters for the storm water collection and detention facilities to be provided on site? What provisions should be incorporated into a Storm Water Management Plan so that erosion does not adversely impact the Younger Lagoon Reserve or the other wetland resources?

LAND RESOURCES

Applicable Policies

30240 (a). Protection of Sensitive Habitat. *Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (See also section on Marine Environment)*

30240 (b). Development Adjacent to Sensitive Habitat. *Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas. (See also section on Marine Environment)*

30241. Protection of Agriculture Production. *The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:*

- *(a) By establishing **stable boundaries** separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.*
- *(b) By **limiting conversions** of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.*
- *(c) By **permitting the conversion** of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.*
- *(d) By developing available **lands not suited for agriculture** prior to the conversion of agricultural lands.*
- *(e) By assuring that **public service and facility expansions and nonagricultural development** do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.*
- *(f) By assuring that all **divisions of prime agricultural lands,** except those conversions approved pursuant to subdivision (b), and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.*

30242. Other Lands Suitable for Agricultural Use. *All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless: (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate*

development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.

30243. Soils Productivity. *The long-term productivity of soils and timberlands shall be protected.*

30244. Archaeological or Paleontological Resources. *Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.*

30222.5. Aquaculture. *Ocean front land that is suitable for coastal dependent aquaculture shall be protected for that use, and proposals for aquaculture facilities located on those sites shall be given priority, except over other coastal dependent developments or uses.*

Context

Soils. The coastal terrace that includes the Long Marine Laboratory site is underlain with Santa Cruz mudstone which is overlaid with soils of varying thickness and texture. Watsonville clay is predominant on the southern and northern portions of the site, while Elkhorn sandy clay loam is found on the central portion. The water table is generally 2 to 3 feet below the surface where a soil hardpan exists (Sage Associates, 1995). Onsite wetlands are found on both soil types. (Strelow, 1997.)

The Coastal Act seeks to maintain the maximum amount of prime agricultural land in production and to minimize conflicts between agricultural and urban land uses. For lands previously used for agriculture, the Act provides for conversion to other uses when renewed agriculture is not feasible or when conversion would serve to concentrate development and would not be incompatible with agriculture on surrounding lands. A 1983 analysis of the agricultural suitability of the on-site soils concluded that there is no prime agricultural soil on the project site and found that restricted water penetration places this property in a Capability Class III with a Storie Index Rating between 40 and 50 (Koch, 1983). Subsequently, in 1995 additional soil analyses were conducted at ten locations, yielding Storie Index ratings from 10 to 40-60, to 73. None of these samples are considered prime based on the Storie Index (Sage Associates, 1995). The land is not currently in agricultural production, and on-site water sources for previous irrigation are no longer in existence. Further, restoration of agricultural production at the site would be constrained by surrounding development, wetlands and bluff setbacks (Sage Associates, 1995. Lands to the north and west of Younger Lagoon are currently cultivated, and questions have been raised concerning the effect of LML land use proposals upon this agricultural use. Questions have been raised concerning the appropriate development setback from agricultural lands.

Non-Native Grassland. The dominant community on the coastal terrace is non-native grassland vegetation. The vegetation is composed of primarily weedy non-native species and is characteristic of plant communities that have been disturbed by human activities. Much of the area was in agricultural production prior to 1988.

Northern Coastal Bluff Scrub. This plant community occurs on the coastal bluffs above Younger Lagoon and in a small strip approximately ten feet in width along the rim of the bluffs. The vegetation is exposed to harsh conditions such as salt spray and desiccating winds. This community has been enhanced recently with native plantings surrounding the Seymour Marine Discovery Center.

Wildlife. The Long Marine Laboratory site provides foraging habitat for a variety of common bird and small mammal species. Even during agricultural production, the site attracted large numbers of birds during the fall and winter due to: 1) its proximity to the coast; 2) the wetland and riparian habitats of Younger Lagoon Reserve and Antonelli Pond; and 3) seasonal ponding on the project site. (Habitat Restoration Group, March 1994.) The presence of existing development at and immediately adjacent to the site limits wildlife habitat values on the terrace portion of the property. Younger Lagoon remains an extremely valuable wildlife habitat for a large diversity of species. Protection of these habitat values with appropriate adjacent land uses and buffers need to be reviewed.

Agricultural Buffers. While the Coastal Act does not provide specific guidelines for agricultural buffers, the Santa Cruz County LCP requires a 200-foot buffer between agricultural and non-agricultural uses. The Younger Lagoon, itself provides a physical buffer from much of the Long Marine Laboratory site that varies from 20 feet to over 700 feet.

Residual Pesticide Concentrations. The Long Marine Laboratory site was farmed in the past using conventional methods. A pesticide investigation has identified residual DDT pesticide concentrations in the surface soils, which is common for west side and north coast properties. Some removal and disposition of contaminated soils may be called for. (Strelow, 1997.) Potential impacts due to the residual concentration will need to be mitigated.

Cultural Resources. Grading and construction associated with development at the Long Marine Laboratory site vicinity may potentially disturb unidentified archaeological resources, although the potential is low based on studies conducted for vicinity projects and the long history of disturbance at the terrace point site. An existing archaeological reconnaissance for the north west portion of the LML site revealed no cultural resources (J. Gilchrist & Associates, Expanded Initial Study-Commercial Algal Facility at LML, 1987). Sensitive paleontological resources are identified along the coastline, from Younger Lagoon to approximately Monterey Street near Cowell Beach. (Strelow, 1997.) In addition, comments in the public record have noted that there may be an historic landmark commemorating the remains of a 1924 shipwreck, the La

Feliz, that lies offshore of the Long Marine Laboratory site. The Seymour Discovery Center has incorporated an interpretive display that includes a ship mast.

Issues

The key issues concerning land resources are:

- **Concentration of Development, Protection of Agriculture.** How can the LRDP proposals be carried out in a manner that will serve to concentrate development, complete a logical and viable neighborhood, and/or contribute to the establishment of a stable boundary separating urban and rural areas? What measures can be employed to minimize conflicts between the nearby agricultural operations (e.g. buffering or timing of activities) and the developed land uses at the Long Marine Laboratory site, and assure the continuing compatibility of the two sets of uses? Is any further analysis necessary regarding the viability of re-establishing agricultural uses at the Long Marine Lab site?

- **Public Service Extension.** How can adequate public services and facilities be made available to LML without destabilizing the urban boundary and encouraging conversion of nearby agricultural lands?

- **Contaminated Soils.** What is the extent of residual contamination of soils on site? What are the potential effects of any such contamination on proposed land uses? What feasible remediation measures should be incorporated into the LRDP?

- **Hazardous Materials Management.** What is the appropriate management program for handling of any potentially hazardous materials associated with the Laboratory operations and within the boat-storage areas?

- **Cultural Resources.** What archaeological or paleontological resources potentially exist at the Long Marine Laboratory site, and what measures can be adopted to provide appropriate protection for any such resources?

DEVELOPMENT

Applicable Policies

30250 (a). Contiguous Development Pattern. *New Residential, commercial, or industrial development, except as otherwise provided in this division, shall 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 and where it*

will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall 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.

30250 (c). Visitor-Serving facilities. *Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors.*

30251. Scenic and Visual Qualities. *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

30252. Services for Public Access and Recreational Facilities. *(See section on Public Access.)*

30253. New Development shall: *(1)* ***Public Safety.*** *Minimize risks to life and property in areas of high geologic, flood, and fire hazard.* ***(2) Geologic Stability.*** *Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.* ***(3) Air Quality Controls.*** *Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development.* ***(4) Energy Consumption.*** *Minimize energy consumption and vehicle miles traveled.* ***(5) Unique Neighborhoods.*** *Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.*

30254. Public Facilities Induce Inconsistent Development. *New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries*

vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

30255. Coastal-dependent and Coastal-related Development. *Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.*

Context

The Long Marine Laboratory site is located entirely within the City limits of Santa Cruz and is located adjacent to existing industrial and residential development. The site is presently served with urban services.

Coastal Erosion. The Marine Laboratory site is subject to coastal erosion. The City's General Plan identifies the coastline adjacent to the site as being an area at "moderate risk" of cliff erosion. Factors affecting seacliff erosion rates include the ability of large storm waves to attack the base of the cliff, and the relative ease with which material can be dislodged. The principal mechanism of cliff retreat at the Marine Laboratory site is wave action that results in undercutting of the bedrock cliffs, and eventually the support is reduced to the point where blocks fail in an instantaneous rock fall. (Foxx, Nielsen Associates, 1992) The Foxx, Nielsen geotechnical analysis recommends a 100-year setback of 50 feet from the top edge of the terrace deposit for all proposed structures to account for both ongoing and episodic (seismic) erosion. A setback of 30 feet would provide protection for 50 years (Foxx, Nielsen Associates, 1992.)

Air Quality. The Marine Laboratory site is located within the North Central Coast Air Basin. This basin includes Monterey, Santa Cruz, and San Benito Counties. The Monterey Bay Unified Air Pollution Control District (MBUAPCD) is responsible for local control and monitoring of criteria air pollutants. The MBUAPCD adopted the 1991 "Air Quality Management Plan (AQMP) for the Monterey Bay Region. Consistency for non-residential projects such as commercial, industrial, or institutional projects is determined by comparing the estimated current population of the county in which the project is to be located with the applicable population forecast in the AQMP.

Water Supply. The Long Marine Laboratory site is located within Santa Cruz City limits. Water service will be provided by the City Water Department. Current City wide demand exceeds the existing safe yield of the system for drought years.

UCSC and CDFG applied to the California Coastal Commission for a permit to construct a new 10-inch line to State-owned facilities adjacent to long Marine Laboratory that would extend from the City's existing 12-inch water line in Delaware at Shaffer. The purpose of the extension is to

provide adequate fire flows to the newly constructed marine mammal facility, as well as, existing and future Long Marine Lab facilities. The Coastal Commission approved the water line with the condition that the line be private and use restricted to LML and CDFG. The line is designed to accommodate future uses at the Long Marine Laboratory site.

Sanitary Sewer Collection. The existing municipal sanitary sewer system includes an 8-inch sewer line which begins at the Shaffer Road/Mission Street intersection and extends south along Shaffer Road to the intersection of Delaware Avenue, where it turns 90 degrees and runs east along Delaware Avenue approximately 450 feet to an existing pump station. This collector becomes a 15-inch line near Natural Bridges Drive from where it extends to further to the east, becoming a 21-inch line near Chase Street. The 21-inch line intersects with another 21-inch main before it enters a tunnel that runs northeasterly to the City's wastewater treatment plant. The City has identified 1,700 linear feet of 15-inch pipeline as approaching capacity. Additionally, upgrades to system pump stations may be required. The City's *1984 Sewer System Master Plan Update* identifies existing sewer system constraints and estimates future development and needed improvements. The Master Plan proposes construction of a 15-inch parallel pipeline to remedy this situation. The City does not consider this improvement is critical and the timing of the improvement is not known. (Strelow, 1997.)

Wastewater Treatment. Wastewater is transmitted to the City's treatment plant at Neary Lagoon. Treated wastewater is discharged into Monterey Bay via a 12,000-foot long ocean outfall. The City has recently completed a major improvement project to provide secondary treatment. City ordinance requires pretreatment of wastes from industrial users. (Strelow, 1997.)

Fire Protection. The City of Santa Cruz Fire Department (SCFD) is responsible for providing fire protection services to all areas within the City limits. The UCSC Fire Department (UCFD) is responsible for providing first response for emergencies on University-owned property. The Marine Laboratory site is located less than 2 miles from the closest SCFD. Younger Lagoon Natural Reserve and the Moore Creek corridor are identified in the City of Santa Cruz General Plan Safety Element as Fire Hazard Areas. (Strelow, 1997.)

Visual Setting. The Long Marine Laboratory site is located in a scenic coastal location and the site is visible from several scenic vantage points, including portions of Highway 1 and from the nearby Natural Bridges State Park. Important visual resources are the site's bluffs and lagoon and its boundary with North Coast croplands.

Commercial Services. Commercial services for public access and recreational facilities are currently provided in the Highway 1 and Delaware Street corridors. Existing public access is accommodated via the existing roadway system. The site is at the western boundary of the

Delaware Avenue corridor and is also accessed via a portion of Shaffer Road. At the present time, there is no grade crossing of the UPRR at Shafer Road.

Issues

The key issues pertaining to the development pattern and services involve:

- **Location of Development.** Does location of the marine research and education center at the Long Marine Laboratory site meet relevant standards including proximity to developed areas able to accommodate the development and absence of significant adverse effects on coastal resources?

- **Priority of Coastal-dependent and Coastal-related Uses.** How do Coastal Act policies giving priority to coastal-dependent and coastal-related land uses on or near the shoreline affect the placement of various components of the center within the overall site? In particular, does inclusion of Long Marine Laboratory-related living and food service accommodations meet coastal-related standards of the Act and, if not, can these uses appropriately be located onsite but relatively removed from the shoreline?

- **Scenic and Visual Qualities.** How can development under the LRDP be carried out in a manner that protects and minimizes impacts on scenic and visual qualities of the coast while providing for program needs of the marine research and education center and meeting policy objectives of the Coastal Act? Resolution of the issue will involve choices between greater site coverage with lower structural profiles and higher profiles with increased open space and ocean views, as well as decisions concerning building character, materials, and massing. Threshold issues will include identification of important view corridors and visual qualities identified for protection.

- **Effect on Public Access.** What provisions are needed to assure that development under the LRDP maintains and enhances public access to this coastal area? Resolving this issue will involve consideration of changes in transit services, traffic, parking; on-site public access facilities; programs for public education; and minimizing coastal traffic by various means including provision of on-site services for persons who work and live there.

- **Bluffs, Geologic Stability, and Public Safety.** What standards for siting and development of structures, roads, accessways, and other facilities are necessary to provide adequate assurance of stability and safety and to protect bluffs from increased erosion and need for protective devices?

- **Air Quality, Energy Consumption.** How can the LRDP serve to provide assurance that development will minimize energy consumption and vehicle miles traveled and enable

compliance with requirements of the Monterey Bay Unified Air Pollution Control District's *Air Quality Management Plan*?

- **Growth-Inducing Public Facilities.** In providing for water, sewerage, communications, and power services adequate to meet the needs of the marine research and education center, what provisions should the LRDP make to avoid inappropriate growth-inducing effects upon agricultural lands and other lands at the urban periphery.

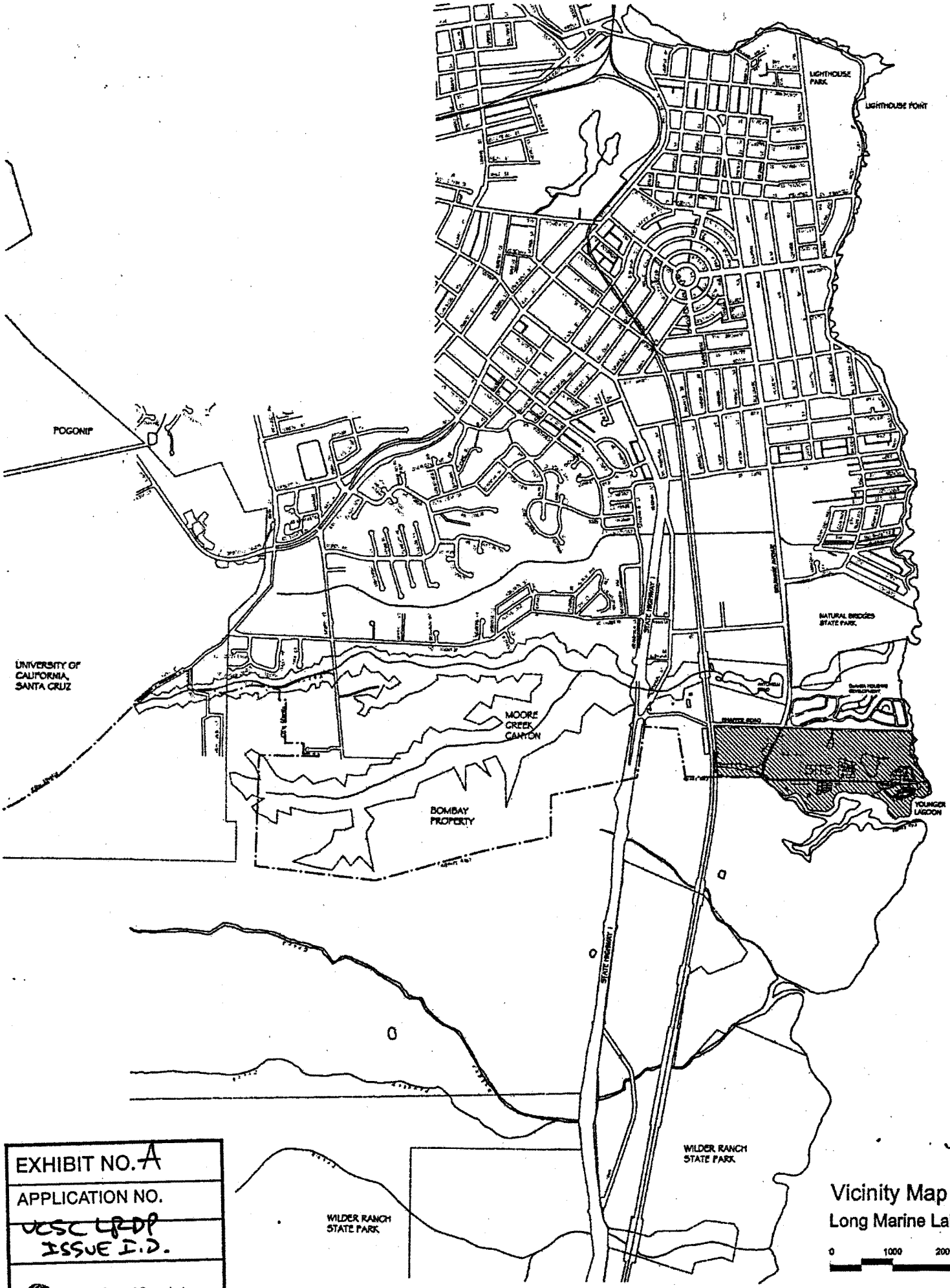

EXHIBIT NO. A

APPLICATION NO.

~~UCSC LRDP~~
ISSUE I.D.

California Coastal Commission

Vicinity Map
Long Marine Lab

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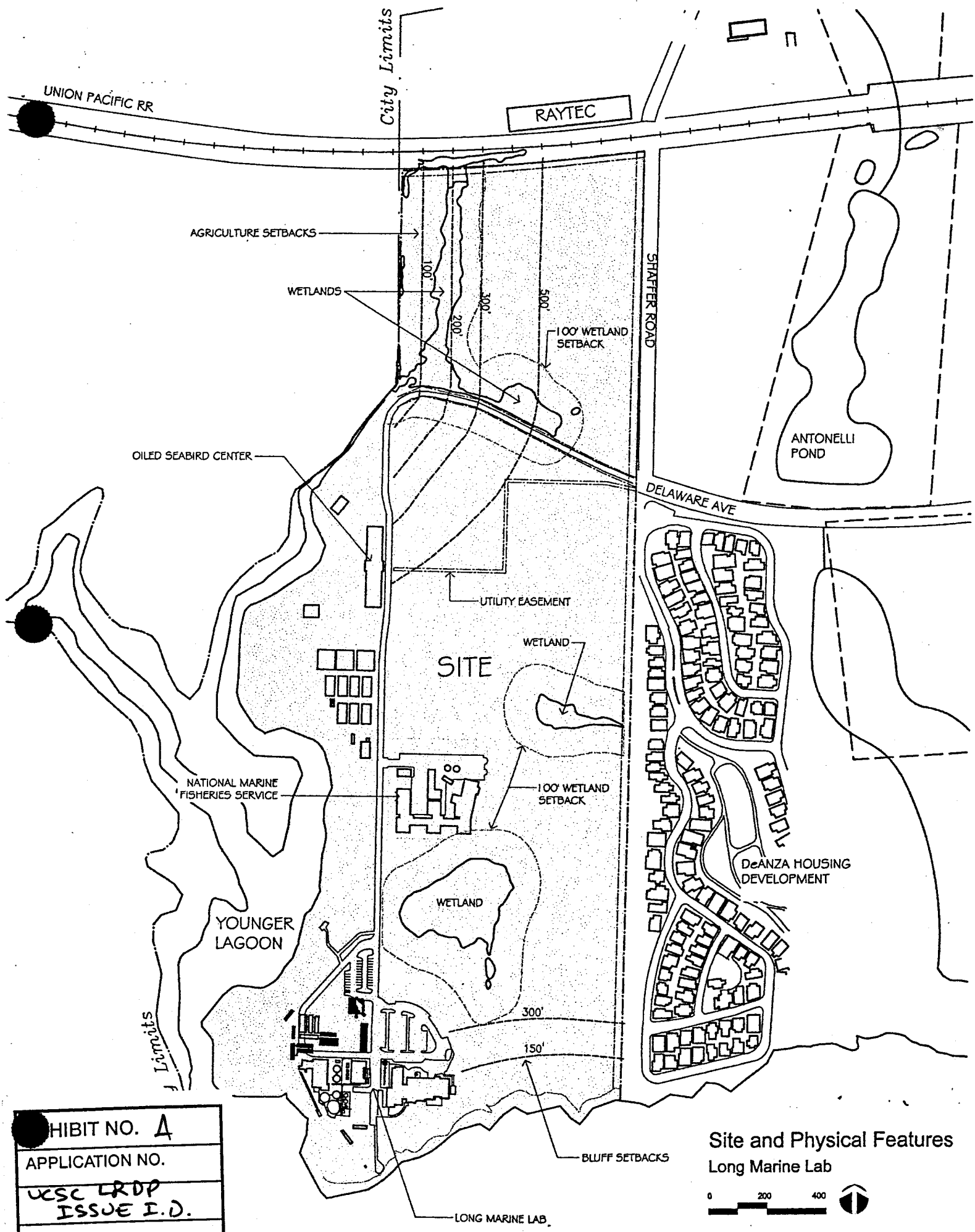

EXHIBIT NO. 4

APPLICATION NO.

UCSC LRDP ISSUE I.D.

California Coastal Commission

Oct-00

UC Santa Cruz
Long Marine Laboratory
LONG RANGE DEVELOPMENT PLAN

California Coastal Act Consistency

SUMMARY ISSUES IDENTIFICATION

EXHIBIT NO. A
APPLICATION NO.
UCSC LRDP Issue I.D.
California Coastal Commission

KEY:

Potentially an Issue	■
Not an issue	○
Not Applicable	NA
Policy Duplicated: (for Convenience)	

	Public Access Related Policies											Recreation Related Policies					
	Access, Recreational Opportunities, Posting	Access to the Sea	Access From Public Roadway	Exclusions to New Development	No Restriction To Public Access	Public Parking	Lower Cost Visitor and Recreational Facilities	Regulation of Public Access	Balancing of Rights	Innovative Techniques	Services for Public Access and Recreational Facilities	Water-Oriented Recreation	Demand for Recreation	Priority for Agriculture or coastal-dependent industry	Aquaculture	Upland Support	Recreational Boating Coastal Waters
	30210	30211	30212(a)	30212(b)	30212©	30212.5	30213	30214(a)	30214(b)	30214©	30252	30220	30221	30222	30222.5	30223	30224
Public Access Issues																	
Younger Lagoon Protection	■	■	■	NA	■	○	○	■	■	■	○	■	■	■	○	○	NA
Lab Security	■	■	■	NA	■	○	○	■	■	■	○	■	■	■	○	○	NA
Coastal Bluff Access	■	■	■	NA	■	○	■	■	■	■	○	■	○	■	○	○	NA
Historic Use	■	■	■	NA	■	○	○	○	■	○	○	○	○	○	○	○	NA
Parking	■	■	■	NA	■	■	○	■	■	○	■	○	○	■	○	■	NA
Signage	■	○	○	NA	○	■	○	■	○	○	■	○	○	○	○	○	NA
Management	■	■	○	NA	■	○	○	■	■	■	■	■	○	○	○	○	NA
Public Access Services and Recreation Facilities	■	■	■	NA	■	■	○	○	○	○	■	○	○	○	○	■	NA
Recreation Issues																	
Use of Shoreline for Surfing	■	■	■	NA	■	○	○	■	■	○	○	■	■	○	○	○	NA
Recreational-Educational Opportunities	■	○	○	NA	○	○	■	○	○	○	○	■	■	■	○	■	NA
Marine Environment Issues																	
Biotic Resources of Lagoon	■	■	■	NA	■	○	○	■	■	■	○	■	■	○	○	○	NA
Habitat Value of Upland Wetland Resources	○	○	○	NA	○	■	○	○	○	○	○	○	○	○	○	○	NA
Sensitive Habitat Protection	■	■	■	NA	■	■	○	■	■	■	○	■	■	○	○	○	NA
cted Species Habitat Management	■	■	■	NA	■	■	○	■	■	■	○	■	■	○	○	○	NA
ical Productivity & Quality of Coastal Waters	■	■	■	NA	■	■	○	■	■	■	○	■	■	○	○	○	NA
Erosion and Sedimentation Controls	○	○	○	NA	○	○	○	○	○	○	○	○	○	○	○	○	NA
Land Resources Issues																	
Development Concentration, Agriculture Protection	○	○	○	NA	○	○	○	○	○	○	○	○	○	○	○	○	NA
Public Service Extension	○	○	○	NA	○	○	○	○	○	○	○	○	○	○	○	○	NA
Contaminated Soils	○	○	○	NA	○	○	○	○	○	○	○	○	○	○	○	○	NA
Hazardous Materials Management	○	○	○	NA	○	○	○	○	■	○	○	○	○	○	○	○	NA
Cultural Resources	○	○	○	NA	○	○	○	○	○	○	○	○	○	○	○	○	NA
Development Issues																	
Location of Development	○	■	○	NA	○	■	○	○	■	○	■	○	○	○	■	○	NA
Coastal-Dependent & Coastal-Related Uses	○	■	○	NA	○	■	○	○	○	○	■	○	○	■	■	○	NA
Scenic and Visual Qualities	○	■	■	NA	○	○	○	○	■	○	○	○	○	○	○	○	NA
Effect on Public Access	■	■	■	NA	■	■	○	■	■	○	■	○	○	○	○	○	NA
Bluffs, Geologic Stability, & Public Safety	■	■	■	NA	○	■	○	○	○	○	■	○	○	○	○	○	NA
Air Quality, Energy Consumption	○	○	○	NA	○	○	○	○	○	○	■	○	○	○	○	○	NA
Growth-Inducing Public facilities	○	○	○	NA	○	○	○	○	○	○	■	○	○	○	○	○	NA

Oct-00

UC Santa Cruz
Long Marine Laboratory
LONG RANGE DEVELOPMENT PLAN

California Coastal Act Consistency

SUMMARY ISSUES IDENTIFICATION

KEY:

Potentially an Issue	■
Not an Issue	○
Not Applicable	NA
Policy Duplicated: (for Convenience)	

Marine Environment Related Policies

	Marine Resource Protection	Biological Productivity	Hazardous Materials	Diking, Filling, or Dredging of Wetlands	Dredging and Spoils Disposal	Enhance the Functional Capacity of the Wetland or Estuary	Erosion Control and Flood Control Facilities	Commercial Fishing and Recreational Boating Industries	Fishing Activities Protected	Revetments, Breakwaters, Groins, Harbor Channels, Seawalls, Cliff Retaining	Channelizations, Dams, or other Substantial Alterations of Rivers and Streams	Protection of Sensitive Habitat	Development Adjacent to Sensitive Habitat
	30230	30231	30232	30233(a)	30233(b)	30233©	30233(d)	30234	30234.5	30235	30236	30240(a)	30240(b)
Public Access Issues													
Younger Lagoon Protection	■	■	○	○	○	■	○	NA	NA	○	○	■	■
Lab Security	○	○	■	○	NA	○	○	NA	NA	○	NA	○	○
Coastal Bluff Access	■	■	○	○	NA	○	■	NA	NA	■	NA	■	■
Historic Use	■	■	○	○	NA	○	○	NA	NA	■	NA	■	■
Parking	■	■	■	■	NA	○	○	NA	NA	○	NA	○	■
Signage	■	■	○	○	NA	○	○	NA	NA	○	NA	■	■
Management	■	■	○	○	NA	○	■	NA	NA	○	NA	■	■
Public Access Services and Recreation Facilities	■	○	○	○	NA	○	○	NA	NA	○	NA	○	○
Recreation Issues													
Use of Shoreline for Surfing	■	■	○	○	NA	○	○	NA	NA	○	NA	■	○
Recreational-Educational Opportunities	■	○	○	○	NA	○	○	NA	NA	○	NA	■	○
Marine Environment Issues													
Biotic Resources of Lagoon	■	■	■	■	○	■	■	NA	NA	■	○	■	■
Habitat Value of Upland Wetland Resources	■	■	■	■	NA	■	■	NA	NA	○	NA	■	■
Sensitive Habitat Protection	■	■	■	■	NA	■	■	NA	NA	○	NA	■	■
Protected Species Habitat Management	■	■	■	■	NA	■	■	NA	NA	○	NA	■	■
Biological Productivity & Quality of Coastal Waters	■	■	■	■	○	■	■	NA	NA	■	○	■	■
Erosion and Sedimentation Controls	■	■	■	■	NA	■	■	NA	NA	■	○	■	■
Land Resources Issues													
Development Concentration, Agriculture Protection	○	○	■	■	NA	■	■	NA	NA	○	NA	○	○
Public Service Extension	○	○	○	○	NA	○	○	NA	NA	○	NA	○	○
Contaminated Soils	■	■	■	○	NA	○	○	NA	NA	○	NA	■	■
Hazardous Materials Management	■	■	■	○	NA	○	○	NA	NA	○	NA	■	■
Cultural Resources	○	○	○	○	NA	○	○	NA	NA	○	NA	○	○
Development Issues													
Location of Development	■	■	○	■	NA	○	■	NA	NA	■	NA	■	■
Coastal-Dependent & Coastal-Related Uses	○	○	○	○	NA	○	○	NA	NA	○	NA	○	○
Scenic and Visual Qualities	○	○	○	○	NA	○	○	NA	NA	■	NA	○	○
Effect on Public Access	○	○	○	○	NA	○	○	NA	NA	○	NA	○	○
Bluffs, Geologic Stability, & Public Safety	○	○	○	○	NA	○	■	NA	NA	■	NA	○	○
Air Quality, Energy Consumption	○	○	○	○	NA	○	○	NA	NA	○	NA	○	○
Growth-Inducing Public facilities	○	○	○	○	NA	○	○	NA	NA	○	NA	○	○

Oct-00

UC Santa Cruz
Long Marine Laboratory
LONG RANGE DEVELOPMENT PLAN

California Coastal Act Consistency

SUMMARY ISSUE IDENTIFICATION

EXHIBIT NO. A
APPLICATION NO.
UCSC LRDP Issue I.D.

California Coastal Commission

KEY:

Potentially an Issue	■
Not an Issue	○
Not Applicable	NA
Policy Duplicated: (for Convenience)	

	Land Resources Related Policies								Development Related Policies								
	Protection of Sensitive Habitat	Development Adjacent to Sensitive Habitat	Protection of Agriculture Production	Economic Feasibility of Agricultural Uses	Other Lands Suitable for Agricultural Use	Soils Productivity	Archaeological or Paleontological Resources	Aquaculture	Contiguous Development Pattern	Hazardous Industrial Development	Visitor-Serving Facilities	Scenic and Visual Qualities	Services for Public Access and Recreational Facilities	Public Safety; Geologic Stability, Air Quality Controls, Energy Consumption, and Unique Neighborhoods	Public Facilities Induce Inconsistent Development	Terms or Conditio Sewage Treatment	Coastal-Depende Coastal-Relate Development
	30240(a)	30240(b)	30241	30241.5	30242	30243	30244	30222.5	30250(a)	30250(b)	30250©	30251	30252	30253	30254	30254.5	30255
Public Access Issues																	
Younger Lagoon Protection	■	■	○	NA	○	○	○	○	○	NA	○	○	○	○	○	NA	○
Lab Security	○	○	○	NA	○	○	○	○	○	NA	○	○	○	○	○	NA	○
Coastal Bluff Access	■	■	○	NA	○	○	○	○	○	NA	○	○	○	■	○	NA	○
Historic Use	■	■	○	NA	○	○	○	○	○	NA	○	○	○	○	○	NA	○
Parking	○	■	○	NA	○	○	○	○	○	NA	■	○	■	○	○	NA	○
Signage	■	■	○	NA	○	○	○	○	○	NA	○	○	■	■	○	NA	○
Management	■	■	■	NA	○	○	○	○	○	NA	■	○	■	■	○	NA	○
Public Access Services and Recreation Facilities	○	○	○	NA	○	○	○	○	○	NA	■	○	■	○	○	NA	○
Recreation Issues																	
Use of Shoreline for Surfing	■	○	○	NA	○	○	○	○	○	NA	■	○	○	○	○	NA	○
Recreational-Educational Opportunities	■	○	○	NA	○	○	■	○	○	NA	■	○	○	○	○	NA	○
Marine Environment Issues																	
Biotic Resources of Lagoon	■	■	○	NA	○	○	○	○	○	NA	○	■	○	○	○	NA	○
Habitat Value of Upland Wetland Resources	■	■	○	NA	○	○	○	○	■	NA	○	■	○	○	○	NA	○
Sensitive Habitat Protection	■	■	○	NA	○	○	○	○	■	NA	○	■	○	○	○	NA	○
Protected Species Habitat Management	■	■	○	NA	○	○	○	○	■	NA	○	■	○	○	○	NA	○
Biological Productivity & Quality of Coastal Waters	■	■	○	NA	○	○	○	○	■	NA	○	■	○	■	○	NA	○
Erosion and Sedimentation Controls	■	■	○	NA	○	○	○	○	○	NA	○	○	○	■	○	NA	○
Land Resources Issues																	
Development Concentration, Agriculture Protection	○	○	■	NA	■	■	○	○	■	NA	○	■	○	○	■	NA	■
Public Service Extension	○	○	■	NA	■	○	○	○	■	NA	○	■	○	○	■	NA	○
Contaminated Soils	■	■	○	NA	○	■	○	○	○	NA	○	○	○	○	○	NA	○
Hazardous Materials Management	■	■	○	NA	○	■	○	○	○	NA	○	○	○	○	○	NA	○
Cultural Resources	○	○	○	NA	○	○	■	○	■	NA	○	○	○	○	○	NA	○
Development Issues																	
Location of Development	■	■	■	NA	■	○	■	■	■	NA	■	■	■	■	■	NA	■
Coastal-Dependent & Coastal-Related Uses	○	○	○	NA	○	○	○	■	○	NA	■	■	■	○	■	NA	■
Scenic and Visual Qualities	○	○	○	NA	○	○	○	○	○	NA	○	■	○	○	■	NA	○
Effect on Public Access	○	○	○	NA	○	○	○	○	○	NA	○	■	■	■	○	NA	■
Bluffs, Geologic Stability, & Public Safety	○	○	○	NA	○	○	○	○	○	NA	■	■	■	■	○	NA	○
Air Quality, Energy Consumption	○	○	○	NA	○	○	○	○	■	NA	■	○	■	■	■	NA	○
Growth-Inducing Public facilities	○	○	■	NA	■	○	○	○	■	NA	■	■	■	■	■	NA	○