

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877
WEB: WWW.COASTAL.CA.GOV



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Prepared August 21, 2020 for September 11, 2020 Hearing

To: Commissioners and Interested Persons

From: Susan Craig, Central Coast District Manager
Katie Butler, Coastal Planner

**Subject: City of Pismo Beach LCP Amendment Number LCP-3-PSB-20-0037-1
(Residential Very High Density Overlay and 855 4th Street Rezoning)**

SUMMARY OF STAFF RECOMMENDATION

The City of Pismo Beach proposes to amend its Local Coastal Program (LCP) to add a new Residential Very High Density (RVHD) overlay zone that would increase LCP height and density maximums (to 45 feet and 50 units per acre, respectively) and relax certain development standards for 100 percent affordable housing projects. The proposed amendment would also add the RVHD overlay and make conforming changes to a 1.2-acre property located at 855 4th Street (APN 005-242-019), namely to change the underlying Land Use Plan (LUP) land use designation from Commercial to High Density Residential, and to change the Implementation Plan (IP) zoning from Retail Commercial (C-1) to High Density Residential (R-3). The intended purpose of the changes affecting the 855 4th Street property is to facilitate an envisioned 50-unit, 100-percent-affordable housing project.

In general, the proposed new overlay zone would help foster Coastal Act and LUP objectives that encourage affordable housing and a mix of housing types. And staff is supportive of the concept. However, as proposed it raises two issues that require modifications to be able to allow its certification. The first is that the underlying LUP maximums for High Density Residential land uses are lower than the proposed new IP RVHD maximums, and thus the RVHD overlay cannot be found consistent with the LUP as proposed. Fortunately, this is readily remedied by adding a new higher density LUP land use category to the LCP that can accommodate the overlay.

In addition, the City intends to apply the overlay on a case-by-case basis for 100 percent affordable housing projects on targeted sites through individual and site-specific LCP amendments for locations that are deemed appropriate for this type of very high density housing. The idea is that the case and site-specific details of any particular

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

property would be evaluated at that time as part of the necessary LCP amendment to establish appropriate development standards that can accommodate the increased density and intensity of affordable housing use, while appropriately protecting coastal resources. However, this evaluation is implicit and not explicit under the proposed text, and it is important to make it clear that such an evaluation is necessary at that time, including so that the appropriate standards for any particular site can be made part of the LCP through the requisite amendment. This is particularly important as the overlay would allow for building heights up to 45 feet, which is 10 feet higher than the existing high-density residential limit, and would be the highest maximum height that would be allowed in the City. Such building heights, as well as related size and scale attributes (e.g., lot coverage, setbacks, building floor area, required visual corridors, etc.) could lead to coastal resource impacts, especially for protected view areas (e.g., seaward of Highway 101). The applicable maximum development intensity standards for a property can and need to be addressed as part of the LCP amendment to ensure such coastal resources are protected as part of any subsequent project.

With respect to the evaluation for the 1.2-acre site at 855 4th Street, the property is in an existing developed area of the City that is home to a mix of land uses and is not near the beach nor visible from Highway 101. Applying the overlay and allowing for an increased development height and density (and meeting other LCP standards otherwise) should not lead to significant adverse coastal resource impacts from a future project. Thus, in this case, these relatively simple allowed increases are identified for this property, and can be made part of the LCP for this site. Ultimately, it is envisioned that a 50-unit 100-percent-affordable housing project will follow, subject to its own CDP, helping to increase the stock of sorely needed affordable options in Pismo Beach.

In sum, the proposed RVHD overlay, as modified, represents an important tool for the City to meet its affordable housing objectives while ensuring guardianship of its LCP-protected coastal resources. As modified, the proposed amendment is consistent with and adequate to carry out the Coastal Act and LUP, and City staff has indicated they are in agreement with the staff recommendation. Therefore, staff recommends that the Commission approve the amendment with suggested modifications. The required motions and resolutions (there are four necessary in this case) are found on pages 4 and 5 below.

Staff Note: LCP Amendment Action Deadline

This proposed LCP amendment was filed as complete on August 13, 2020. The proposed amendment affects both the LCP's LUP and IP, and the 90-working-day action deadline is December 23, 2020. Thus, unless the Commission extends the action deadline (it may be extended by up to one year), the Commission has until December 23, 2020 to take a final action on this LCP amendment.

TABLE OF CONTENTS

I. MOTIONS AND RESOLUTIONS	4
II. SUGGESTED MODIFICATIONS	6
III. FINDINGS AND DECLARATIONS	7
A. DESCRIPTION OF PROPOSED LCP AMENDMENT.....	7
B. STANDARD OF REVIEW	8
C. COASTAL ACT CONSISTENCY ANALYSIS	8
D. LUP CONSISTENCY ANALYSIS	9
E. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA).....	13

EXHIBITS

- Exhibit 1: Proposed IP Amendment: RVHD overlay
- Exhibit 2: Proposed LUP and IP Amendment: 855 4th Street
- Exhibit 3: Map of 855 4th Street

APPENDICES

- Appendix A – Substantive File Documents
- Appendix B – Staff Contacts with Agencies and Groups

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

I. Motions and Resolutions

Staff recommends that the Commission, after public hearing, approve the proposed LCP amendment with suggested modifications. The Commission needs to make four motions, two on the LUP amendment and two on the IP amendment, in order to act on this recommendation.

1. Motion and Vote #1: Deny the LUP Amendment as submitted

Staff recommends a **NO** vote on the motion below. Failure of this motion will result in denial of the LUP amendment as submitted and adoption of the following resolution. The motion passes only by an affirmative vote of a majority of the appointed Commissioners.

Motion 1: I move that the Commission certify Land Use Plan Major Amendment Number LCP-3-PSB-20-0037-1 as submitted by the City of Pismo Beach, and I recommend a **no** vote.

Resolution: The Commission hereby denies certification of Land Use Plan Major Amendment Number LCP-3-PSB-20-0037-1 as submitted by the City of Pismo Beach and adopts the findings set forth below on grounds that the Land Use Plan amendment as submitted does not meet the requirements of, and is not in conformity with, the policies of Chapter 3 of the Coastal Act. Certification of the Land Use Plan amendment would not meet the requirements of the California Environmental Quality Act, as there are feasible alternatives and mitigation measures that would substantially lessen the significant adverse impacts on the environment that will result from certification of the land use plan amendment as submitted.

2. Motion and Vote #2: Certify the LUP Amendment with Suggested Modifications

Staff recommends a **YES** vote on the motion below. Passage of this motion will result in certification of the amendment with suggested modifications and the adoption of the following resolution and the findings in this staff report. The motion passes only by an affirmative vote of a majority of the appointed Commissioners.

Motion 2: I move that the Commission certify Land Use Plan Major Amendment Number LCP-3-PSB-20-0037-1 if it is modified as suggested in this staff report, and I recommend a **yes** vote.

Resolution: The Commission hereby certifies Land Use Plan Major Amendment Number LCP-3-PSB-20-0037-1 to the City of Pismo Beach Local Coastal Program if modified as suggested and adopts the findings set forth in this staff report on the grounds that the Land Use Plan amendment with the suggested modifications will meet the requirements of, and be in conformity with, the policies of Chapter 3 of the Coastal Act. Certification of the Land Use Plan amendment, if modified as suggested, complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

adverse effects of the plan on the environment, or 2) there are no further feasible alternatives and mitigation measures that would substantially lessen any significant adverse impacts on the environment that will result from certification of the land use plan amendment if modified.

3. Motion and Vote #3: Deny the IP Amendment as Submitted

Staff recommends a **YES** vote on the motion below. Passage of this motion will result in rejection of the Implementation Plan amendment as submitted and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the appointed Commissioners.

Motion 3: I move that the Commission reject Implementation Plan Amendment Number LCP-3-PSB-20-0037-1 as submitted by the City of Pismo Beach, and I recommend a **yes** vote.

Resolution: The Commission hereby denies certification of Implementation Plan Amendment Number LCP-3-PSB-20-0037-1 for the City of Pismo Beach and adopts the findings set forth below on grounds that the Implementation Plan as submitted does not conform with, and is inadequate to carry out, the provisions of the certified Land Use Plan. Certification of the Implementation Plan would not meet the requirements of the California Environmental Quality Act as there are feasible alternatives and mitigation measures that would substantially lessen the significant adverse impacts on the environment that would result from certification of the Implementation Plan as submitted.

4. Motion and Vote #4: Certify the IP Amendment with Suggested Modifications

Staff recommends a **YES** vote on the motion below. Passage of this motion will result in certification of the amendment with suggested modifications and the adoption of the following resolution and the findings in this staff report. The motion passes only by an affirmative vote of a majority of the appointed Commissioners:

Motion 4: I move that the Commission certify Implementation Plan Amendment Number LCP-3-PSB-20-0037-1 if it is modified as suggested in this staff report, and I recommend a **yes** vote.

Resolution: The Commission hereby certifies Implementation Plan Amendment Number LCP-3-PSB-20-0037-1 to the City of Pismo Beach Local Coastal Program if modified as suggested and adopts the findings set forth in this staff report on the grounds that the Implementation Plan amendment with the suggested modifications conforms with, and is adequate to carry out, the provisions of the certified Land Use Plan. Certification of the Implementation Plan amendment if modified as suggested complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Implementation Plan on the environment, or 2) there are no further feasible alternatives and mitigation measures that would substantially lessen any significant adverse impacts on the environment.

II. Suggested Modifications

The Commission hereby suggests the following modifications to the proposed LCP amendment, which are necessary to make the requisite Coastal Act and LUP consistency findings. If the City of Pismo Beach accepts each of the suggested modifications within six months of Commission action (i.e., by March 11, 2021), by formal resolution of the City Council, the modified amendment will become effective upon Commission concurrence with the Executive Director's finding that this acceptance has been properly accomplished. Text in ~~cross-out~~ format and text in underline format denotes required deletions and additions, respectively.

1. Modify LUP Land Use Policy LU-2 and Table LU-3 as follows:

LU-2 Residential Uses. Residential land uses include the categories of Low, Medium, ~~and High, and Very High~~ density. ...

...

d. Densities. Permissible housing densities are established within ~~three~~ four broad categories shown in Table LU-3.

Category	Density
Low Density	1 to 8 units per ac.
Medium Density	9 to 15 units per ac.
High Density	16 to 30 units per ac.
<u>High Density with Residential Very High Density Overlay</u>	<u>Up to 50 units per ac. and up to 45 feet in height</u>

2. Modify proposed IP Section 17.091.020 as follows:

The standards and regulations of this Chapter apply to areas designated with an RVHD overlay extension on the Zoning Map. Designation of a parcel or parcels with the RVHD overlay shall constitute an amendment to the Local Coastal Program's Implementation Plan, and shall require review and certification by the Coastal Commission. Any such amendment shall identify the maximum amount of development that can be accommodated pursuant to the RVHD overlay without adversely affecting coastal resources, including in terms of maximum building heights and maximum development envelopes, and such maximums shall be prescribed for any such parcels in subsection 17.091.050.G. Except as provided in this Chapter, all new structures and development, as well as alterations to existing structures, shall comply with the requirements and review procedures of the R-3 Zoning District.

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

3. Modify proposed IP Section 17.091.050 to add a new subsection G as follows:

G. Site-specific development standards. In no case, including with respect to any otherwise permissible development deviation/exception/variance, shall development exceed the following site-specific development standards.

1. Development at 855 4th Street (APN 005-242-019) under the RVHD overlay shall be limited to a maximum height of 45 feet.

III. Findings and Declarations

A. Description of Proposed LCP Amendment

The proposed amendment would add a new chapter to the Implementation Plan for a new Residential Very High Density (RVHD) overlay district. The purpose of the overlay is to help the City provide for needed affordable housing on sites able to accommodate such housing by increasing allowed height and density and by relaxing certain development standards for projects that provide 100 percent affordable housing. Specifically, the overlay would provide for a minimum density of 20 units/acre and a maximum of up to 50 units/acre. The provisions and allowances of the overlay district would only be allowed to be used by projects where 100 percent of the total number of residential units are affordable to moderate-income or below-moderate-income households for a minimum of 55 years. The overlay would only apply to properties zoned Multi-Family Residential (R-3), and the intent is that the RVHD overlay would be applied via a separate LCP amendment for each site (including concurrently with a site-specific rezoning to R-3 if the site is not already zoned as such).

The amendment includes general development standards that would apply in the overlay district, including:

- Maximum building height of 35 feet, and up to 45 feet where the Planning Commission finds that significant public views to and along the coast and other scenic areas are protected. A visual study is required in order to evaluate a project's compliance with this criterion.
- Minimum front yard setbacks of 10 feet.
- No maximum allowable lot coverage.
- No maximum allowable total building floor area.
- No minimum lot area per family unit.
- Minimum landscaped area of 10% of total lot area.

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

In addition, the proposed amendment would also add the RVHD overlay and make conforming changes to a 1.2-acre property located at 855 4th Street (APN 005-242-019), namely to change the LUP land use designation from Commercial to High Density Residential, and to change the IP zoning from Retail Commercial (C-1) to High Density Residential (R-3). The intended purpose of the changes affecting the 855 4th Street property is to facilitate a 50-unit, 100 percent affordable housing project.¹

Please see **Exhibit 1** for the proposed IP RVHD changes, **Exhibit 2** for the proposed LUP and IP changes specific to 855 4th Street, and **Exhibit 3** for a map showing the 855 4th Street site.

B. Standard of Review

The proposed amendment affects both the LUP and IP components of the City of Pismo Beach LCP. The standard of review for LUP amendments is that they must be consistent with and adequate to carry out the Chapter 3 of the Coastal Act. The standard of review for IP amendments is that they must be consistent with and adequate to carry out the policies of the certified LUP.

C. Coastal Act Consistency Analysis

The Coastal Act requires that new residential development to be located in close proximity to existing developed areas able to accommodate it and where it will not significantly and adversely affect coastal resources, including public views, sensitive habitats, and public recreational access. The Coastal Act states:

Section 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, Coastal Act Sections 30604(f) and (g) encourage affordable housing when such housing would not result in coastal resource impacts. Similarly, the Commission's Environmental Justice Policy supports equitable development for all who live on California's coast, including in terms of fostering affordable housing opportunities.

Section 30604(f). The commission shall encourage housing opportunities for persons of low and moderate income. ...

Section 30604(g). The Legislature finds and declares that it is important for the commission to encourage the protection of existing and the provision of new affordable housing opportunities for persons of low and moderate income in the coastal zone.

¹ Proposed by Peoples Self-Help Housing, an affordable housing developer.

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

Coastal Commission Environmental Justice Policy. ... The Commission will use its legal authority to ensure equitable access to clean, healthy, and accessible coastal environments for communities that have been disproportionately overburdened by pollution or with natural resources that have been subjected to permanent damage for the benefit of wealthier communities. Coastal development should be inclusive for all who work, live, and recreate on California's coast and provide equitable benefits for communities that have historically been excluded, marginalized, or harmed by coastal development. ...

The proposed amendment would change the land use designation at 855 4th Street (APN 005-242-019) from Commercial to High Density Residential for the intended purpose of facilitating a 100-percent-affordable housing project (in conjunction with the proposed IP amendment described below). The parcel is located on an existing developed site (a vacant office building) in an existing developed area of the City that is home to a mix of land uses (regional commercial shopping centers, offices, high density housing, hotels, restaurants, and gas stations). Although residential uses are a lower priority under the Coastal Act than commercial visitor-serving uses, the site in question is not explicitly called out for visitor-serving uses, and the LCP appropriately provides for a range of commercial visitor-serving designations.

In addition, the proposed designation is consistent with Coastal Act Section 30250(a). The site in question is not near the beach nor is it visible from Highway 101, and residential development here under the LCP would not be expected to lead to significant coastal resource impacts. In addition, the amendment is meant to provide for affordable housing opportunities, which is encouraged by the Coastal Act and the Commission's Environmental Justice Policy. Thus, the proposed LUP amendment is consistent with the Coastal Act.

D. LUP Consistency Analysis

Applicable LUP Provisions

The City of Pismo Beach's LUP contains a series of provisions that encourage higher density housing in close proximity to amenities, and acknowledges the need for a mix of housing types. Applicable LUP provisions include:

LUP Conservation and Open Space Policy CO-1: Siting of Multifamily Projects. In order to provide easy pedestrian access to commercial areas, the City shall encourage the location of multifamily projects in close proximity to transit routes and to commercial centers. Mixed-use development shall be encouraged in most commercial zones. The land use map shall also consider neighborhood commercial development in reasonable proximity to residential areas.

LUP Conservation and Open Space Policy CO-2: Jobs/Housing Balance. A mismatch of jobs to affordable housing in the existing city limits, as well as in developments that may occur in annexation areas, could cause unnecessary commuting and consequently excessive energy consumption and air

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

pollution. The City shall require the prevention or mitigation of these conditions as an element of environmental review. Mitigation may include inclusionary affordable housing and worker housing as called for in the Housing Element. ...

LUP Land Use Principle P-15: Visitor/Resident Balance. The California coast is an extremely desirable place to live, work and recreate that belongs to all the people. As such, congenial and cooperative use by both residents and visitors is recognized. Such use should capture the best attributes of the city and creatively determine the acceptable place, scale, intensity, rate and methods for development consistent with resource protection and public benefit.

LUP Land Use Policy LU-2: Residential Uses. Residential land uses include the categories of Low, Medium and High density. Specific policies for residential uses are:

a. Variety of Residential Land Uses. Encouraged In order to provide a variety of housing choices for all income groups and create residential areas with distinctive identity a wide variety of densities and housing types shall be encouraged.

b. Cluster Development Encouraged. Cluster developments are encouraged where they provide increased open space, better visual qualities, and additional preservation of sensitive sites, decreased cost of municipal services or an opportunity to provide affordable housing...

d. Densities. Permissible housing densities are established within three broad categories shown in Table LU-3:

Table LU-3	
Housing Categories and Density	
Category	Density
Low Density	1 to 8 units per acre
Medium Density	9 to 15 units per acre
High Density	16 to 30 units per acre

LUP Land Use Policy M-1 (Pismo Marsh - Planning Area M) Concept. The Pismo Marsh area shall be designated for regional commercial uses (Commercial), moderate cost highway visitor-serving uses (Resort Commercial), a Mobile Home Park, Industrial and Open Space with an emphasis on protection of the marsh habitat. Retaining and enhancing pleasant views from the 101 Freeway are important.

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

Consistency Analysis

The IP amendment includes the new proposed Residential Very High Density Overlay (RVHD) overlay district as well as a site-specific rezoning and application of the new overlay at 855 4th Street. The proposed RVHD overlay district would be a new tool for the City to allow for 100 percent affordable housing projects to be built at a greater density than the LCP currently allows. Specifically, the overlay would require a minimum density of 20 units per acre and allow for a maximum of 50 units per acre. The RVHD overlay also prescribes various development standards that would facilitate such increased density on a site, including the potential for an additional 10 feet of building height over the existing allowed 35 feet maximum; reduced front yard setbacks; reduced required landscaping area; no maximum lot coverage, building floor area, or minimum lot area per family unit requirements; and reduced parking requirements.

In general, the proposed overlay is consistent with LUP policies that encourage and allow for affordable and higher density housing; however, a few modifications are needed to address LUP conformity and coastal resource protection. First, the LUP prescribes specific height and density limitations throughout the City, including a maximum of 35 feet and 30 dwelling units per acre for the High Density Residential land use category. The proposed amendment is meant to essentially upzone certain properties with up to 45-foot heights and 50 unit/acre densities, which could be appropriate for certain sites able to accommodate such additional height and density. However, the proposed new RVHD IP maximums exceed, and thus cannot be found consistent with, the underlying LUP maximums for High Density Residential land uses. To address this inconsistency, **Suggested Modification 1** adds a new High Density with Residential Very High Density Overlay land use category to match the overlay, which will provide consistency between the LUP and IP in terms of allowable density.

Second, overlay zones or districts typically function to augment or clarify specific LCP requirements. The City of Pismo Beach's LCP includes 14 overlay zones, most of which (including, for example, the Archaeology and Historic Sites, Floodplain, and Hazards and Protection overlay zones) are identified on maps for distinct areas of the City, thereby illustrating where these additional requirements must be considered and applied. In the case of the proposed RVHD overlay zone, the City has indicated that it will be applied on case-by-case and site-specific bases for 100 percent affordable housing projects on targeted sites, through individual and site-specific LCP amendments at locations that are deemed appropriate for this type of very high density housing. Although this is the City's stated intent, and while such changes would constitute an LCP amendment, the amendment itself does not explicitly specify that individual LCP amendments would be required. To make this aspect of the overlay tool clear, and explicit rather than implicit, **Suggested Modification 2** adds a requirement that designation of a parcel or parcels with the RVHD overlay constitutes an LCP amendment that requires review and certification by the Coastal Commission.

As part of any such LCP amendment, it will be important to consider the potential coastal resource impacts as a result of applying the proposed RVHD overlay to a parcel, including with respect to increased density and reduced development standards and whether the particular parcel in question can accommodate the increased

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

development potential. This is particularly important as the overlay would allow for building heights up to 45 feet, which is 10 feet higher than the existing high-density residential limit, and would be the highest maximum height that would be allowed in the City. Such building sizes could, in certain areas of the City, block or otherwise adversely impact coastal views that are protected by the LCP, especially for protected view areas (e.g., seaward of Highway 101). The proposed overlay would also allow for other changes to existing development standards to accommodate the intended higher density and intensity of use, including with respect to lot coverage, setbacks, and building floor area. This would allow for an increased amount of development with a greater bulk, mass, and scale that could also adversely impact views to and along the ocean and shoreline, as well as potentially lead to other coastal resources impacts (such as related to public access, water quality and habitat). Such resources are protected by the LCP, and the overlay zone, as proposed, does not specifically address how such resources will continue to be protected.

As such, **Suggested Modification 3** adds language that requires each LCP amendment that proposes to apply the RVHD overlay to a specific site to identify the maximum amount of development that can be accommodated on that site without adversely impacting coastal resources. In other words, this modification prescribes that site-specific application of the overlay can only be approved if it is accompanied by clear and specific development maximums that ensure that coastal resources can be fully protected as required by the LCP. To be clear, the intent is that considerations of appropriate scale, intensity and density of allowed future use on any particular RVHD site will be defined through the required LCP amendment process, and that any potential deviations, exceptions, and/or variances that might otherwise be allowable through a CDP process shall not be applicable. **Suggested Modification 3** provides a new subsection for the development parameters and restrictions specific to each site where the overlay is intended, including for the 1.2-acre site at 855 4th Street. All future site-specific development controls will be listed in this subsection as well, including for height, density, setbacks, etc., as needed to make clear the total amount of development that is allowed at each site.² As modified, the IP amendment would ensure protection of coastal resources consistent with the LUP.

Finally, the site-specific rezoning of the 1.2-acre parcel at 855 4th Street from Retail Commercial (C-1) to High Density Residential (R-3) and utilization of the RVHD overlay is consistent with the LUP for similar reasons as described above for the land use designation change.

² In this case, the suggested modification prescribes a 45-foot height maximum for the site at 855 4th Street. Other projects that utilize the RVHD overlay may have other development parameters prescribed to ensure LCP consistency and coastal resource protection, including in terms of necessary setbacks, densities, view corridors, and floor area ratios. In other words, the coastal resource constraints for a specific site may dictate other specific development restrictions beyond those identified for the site at 855 4th Street. And as stated above, the intent is to identify these parameters as part of the LCP amendment process to provide certainty about how projects subject to the overlay would be accounted for, including by providing an absolute maximum that is not allowed to be modified in the future by any incentive/waiver/variance that may otherwise be allowed through a CDP process.

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

In sum, the proposed RVHD overlay, as modified, represents an important tool for the City to meet its affordable housing objectives while also ensuring that its LCP-protected coastal resources are appropriately countenanced and accounted for in that process. The specific rezoning and use of the overlay at 855 4th Street to allow for a 50-unit 100-percent-affordable housing project will allow for much-needed affordable housing in the City and the region and provides an example of how the City intends to utilize the RVHD tool in the future at appropriate sites in a manner that does not adversely impact coastal resources.

E. California Environmental Quality Act (CEQA)

CEQA Section 21080.5(d)(2)(A) prohibits a proposed LCP or LCP amendment from being approved if there are feasible alternatives and/or feasible mitigation measures available that would substantially lessen any significant adverse effect that the LCP or LCP amendment may have on the environment. Although local governments are *not* required to satisfy CEQA in terms of local preparation and adoption of LCPs and LCP amendments, many local governments use the CEQA process to develop information about proposed LCPs and LCP amendments, including to help facilitate Coastal Act review. In this case, the City of Pismo Beach adopted a Mitigated Negative Declaration for the proposed LCP amendment and in doing so found that the amendment would not have significant adverse environmental impacts.

The Coastal Commission is not exempt from satisfying CEQA requirements with respect to LCPs and LCP amendments, but the Commission's LCP/LCP amendment review, approval, and certification process has been certified by the Secretary of the Natural Resources Agency as being the functional equivalent of the environmental review required by CEQA (CCR Section 15251(f)). Accordingly, in fulfilling that review, this report has discussed the relevant coastal resource issues with the proposal, and has concluded that approval of the proposed amendment with the modifications to it suggested is not expected to result in any significant environmental effects, including as those terms are understood in CEQA. Thus, the proposed amendment as suggested to be modified will not result in any significant adverse environmental effects for which feasible mitigation measures have not been employed, consistent with CEQA Section 21080.5(d)(2)(A).

LCP-3-PSB-20-0037-1 (RVHD Overlay and 855 4th Street)

APPENDIX A – SUBSTANTIVE FILE DOCUMENTS³

- City of Pismo Beach Local Coastal Program

APPENDIX B – STAFF CONTACT WITH AGENCIES AND GROUPS

- City of Pismo Beach Planning Division

³ These documents are available from the Commission's Central Coast District office.