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Th9d

Addendum

June 7, 2021

To: Commissioners and Interested Persons

From: California Coastal Commission
San Diego Staff

Subject: Addendum to **Item Th9d, Del Mar Major LCP Amendment No. LCP-6-DMR-20-0005-1 (Sea Level Rise)**, for the Commission Meeting of June 10, 2021

The purpose of this addendum is to: 1) add a link to Appendix A, Substantive File Documents; 2) add an additional Exhibit 13 (attached) that provides examples of Commission-certified LCPs that include policies and regulations that are similar to the suggested modifications of the subject LCP Amendment; and 3) clarify the intent of part of Suggested Modification No. 12. Staff recommends the following changes be made to the above-referenced staff report. Deletions shall be marked by strikethrough and additions shall be underlined.

1. On page 9, after the Table of Contents, add Appendix A with link as follows:

   APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

2. On page 10, add a new Exhibit 13 (attached to this addendum), following Exhibit 12:

   13. Examples of certified LCPS with language similar to the Suggested Modifications

3. On page 62, add clarifying language about the intent of part of Suggested Modification No. 12, as follows:

   Second, Section 30.55.050 (Development Regulations for the Coastal Bluff Overlay Zone) does not state what development is approvable if it is not possible to comply with the setback requirements described in the section. Thus, it does not provide an avenue for compliance with Policy III-9 in those situations. Additionally, under Section 30010 of the Coastal Act, the Commission as well as the local government has a responsibility to avoid the taking of private property without just compensation. Without additional

language describing what development is approvable when parcels are not large enough to accommodate the calculated setback, Section 30.55.050 is inconsistent with Policy III-9.

EXHIBIT 13. EXAMPLES OF CERTIFIED LCPS WITH LANGUAGE SIMILAR TO THE SUGGESTED MODIFICATIONS

The following section provides a list of Commission-certified LCPs and Land Use Plans (LUPs) that include policies and regulations that are similar to the Suggested Modifications to the subject Del Mar LCP Amendment. These examples illustrate that the Suggested Modifications to the subject Del Mar LCP Amendment are not particularly unique; rather, similar concepts have been deemed necessary to ensure consistency with the Coastal Act in the context of sea level rise (SLR) in other jurisdictions throughout the state. Because policies and regulations are always tailored to the specific circumstances of each jurisdiction, there is variation among these examples. Also, please note these lists are not exhaustive, and they focus on recent LCP and LUP certifications in particular. These is based on the best available information at the time of this Addendum.

1. Hazard Maps. Examples of Commission-certified LCPs that include hazard maps that relate to sea level rise, similar to the overlay maps described in Suggested Modification No. 1.

    a. **City of Half Moon Bay LUP (2021; LCP-2-HMB-20-0081-2):** Section 7, Environmental Hazards, Policy 7-10 states, “Maintain and update shoreline hazard maps to incorporate significant updates in best available science and information when such significant updates are available, including areas subject to wave action, flooding, tsunamis, and erosion due to sea level rise.”

    b. **City of Pacific Grove (2020; LCP-3-PGR-18-0093-1):** Chapter 2, Coastal Hazards, includes Figure 3, Coastal Hazards and Areas of Potential Sea Level Rise, which is referenced in several policies of the Chapter.

    c. **City of Santa Barbara Land Use Plan (2019; LCP-4-SBC-18-0062-1)** includes maps of Interim Shoreline Hazards Screening Areas. Various policies and development standards are attached to each one. Policy 5.1-16 requires the City to update shoreline hazard maps to incorporate new sea level rise science and information on coastal conditions.

    d. **San Francisco Land Use Plan (2018; LCP-2-SNF-18-0028-1):** Policy 12.2(g) commits to creating hazard maps: “Create and maintain sea level rise hazard maps to designate areas within the coastal zone that would be exposed to an increased risk of flooding due to sea level rise.”

    e. **County of San Diego Land Use Plan (2017; LCP-6-SDC17-0015-1**) includes Sea Level Rise maps, which are referenced in Policies 9.29 and 9.33.

2. Goals or principles related to SLR. Examples of Commission-certified LCPs that include overarching goals related to sea level rise adaptation, similar to the policy described in Suggested Modification No. 2.

a. **City of Santa Barbara Land Use Plan (2019; LCP-4-SBC-18-0062-1)**: In the discussion "Coastal Bluff Development and Risk Reduction, the City's stated goals are to "1) minimize exposure of new development and substantial redevelopment to the hazards of coastal bluff retreat and coastal erosion, 2) minimize risks to life and property through siting and design, 3) avoid project-induced exacerbation of erosion hazards, and 4) avoid the need for slope and shoreline protection devices that negatively impact natural landforms, beach widths, sand accretion, public access along the beach, and the aesthetic and biological resources of the beach and coastal bluff area."

3. Periodic LCP updates on SLR. Examples of Commission-certified LCPs that include policies calling for periodic or trigger-based LCP updates to address sea level rise, similar to the policy described in Suggested Modification No. 3.

a. **City of Pacific Grove (2020; LCP-3-PGR-18-0093-1):** Policy HAZ-2 states, "Based on the information gathered over time per Policy HAZ-1, the City will conduct an evaluation at least every 10 years (and in response to significant storm events resulting in erosion) as to whether additional policies and other actions for inclusion in the LCP are necessary in order to better address the impacts of sea level rise and other coastal hazards, particularly those related to erosion. As applicable, such periodic evaluations may result in LCP changes to hazard policies designed to: a. require relocation of existing or planned development, including development already protected by shoreline protective devices, to safer locations or higher elevations and restoring shoreline areas to natural conditions if feasible, including working with entities that plan or operate infrastructure; b. modify allowable land uses in hazardous areas, and modify siting and design standards for development, to avoid and minimize risks and better protect coastal resources; c. better protect wetlands and Environmentally Sensitive Habitat Areas; Exhibit 3 LCP-3-PGR-18-0093-1 (Pacific Grove LUP Update and IP Certification) 38 of 161 d. update standards for determining erosion rates; e. ensure long term protection of the function and connectivity of existing public recreational access facilities and resources; and f. require modifications to existing shoreline protective devices to ensure that such devices are meeting then-current standards and are functioning in a way that has the least impact on coastal resources as possible, including evaluation of possible removal and shoreline restoration."

b. **City of Santa Barbara Land Use Plan (2019; LCP-4-SBC-18-0062-1)**: Policies 5.1-14, -15, and -16 call for the development of a Sea Level Rise Adaptation Plan and implementation through a future LCP Amendment. They also commit to periodically updating hazard maps as necessary to incorporate new sea level rise science, monitoring results, and information on coastal conditions.

c. **San Clemente Land Use Plan (2018; LCP-5-SCL-16-0012-1).** Policy HAZ-12: "The Citywide Vulnerability Study shall be updated periodically as new

science and modeling results and/or state guidance become available. This update shall occur approximately every 10 years, or more frequently as necessary, through an LCP amendment."

d. **San Francisco Land Use Plan (2018; LCP-2-SNF-18-0028-1).** Policy 12.2(g) commits to periodic hazard map updates. "The maps shall be updated when new information warranting significant adjustments to sea level rise projections becomes available."

4. Setback calculations. Examples of Commission-certified LCPs that require sea level rise to be considered in the calculation of bluff setbacks, similar to Suggested Modifications No. 4 and No. 12.

   a. **City of Half Moon Bay LUP (2021; LCP-2-HMB-20-0081-2):** Section 7, Environmental Hazards, Policy 7-13 states, "Permit new blufftop development only if, as demonstrated by the site-specific evaluation required by Policy 7-12: a. Design and setback provisions are adequate to assure stability and structural integrity for the anticipated life span of the development, taking into consideration long-term future erosion and short-term episodic erosion including the influence of sea level rise, plus an added geologic stability factor of safety greater than or equal to 1.5 for the static condition and greater than or equal to 1.1 for the seismic condition, without reliance on existing or proposed shoreline protective devices…."

   b. **City of Santa Barbara Land Use Plan (2019; LCP-4-SBC-18-0062-1)**: Policies 5.1-23 and 5.1-36 require setbacks to meet an "an adequate factor of safety (1.5 static conditions; 1.1 pseudostatic conditions) for the expected life of the structure, factoring in the effects of sea level rise;" Policy 5.1-33 provides additional development standards.

   c. **San Clemente Land Use Plan (2018; LCP-5-SCL-16-0012-1):** HAZ-8 states, "long-term average coastal bluff retreat rates over the expected life of the structure (minimum of 75 years unless otherwise specified in the LCP), shall include retreat rates due to expected sea level rise and a scenario that assumes that any existing shoreline or bluff protective device is not in place." HAZ-41 provides additional detail on blufftop setbacks.

   d. **Solana Beach Land Use Plan (2014; LCP-SOL-MAJ-1-13)**: Policy 4.25 states, "All new bluff property development shall be set back from the bluff edge a sufficient distance to ensure that it will not be in danger from erosion and that it will ensure stability for its projected 75-economic life. To determine the GSL, applications for bluff property development must include a geotechnical report, from a licensed Geotechnical Engineer or a certified Engineering Geologist, that establishes the Geologic Setback Line (GSL) for the proposed development. This setback line shall establish the location on the bluff top where stability can be reasonably assured for the economic life of the development. Such assurance will take the form of a quantitative slope analysis demonstrating a minimum factor of safety against sliding of 1.5

(static) or 1.2 (pseudostatic, k-0.15 or determined through analysis by the geotechnical engineer), using shear strength parameters derived from relatively undeformed samples collected at the site. In no case shall the setback be less than 40 feet from the bluff edge, and only if it can be demonstrated that the structure will remain stable, as defined above, at such a location for its 75-year economic life and has been sited safely without reliance on existing or future bluff retention devices, other than a caisson foundation. Furthermore, all new development including, but not limited to principal structures, additions, and ancillary structures, shall be specifically designed and constructed such that it could be removed in the event of endangerment. The predicted bluff retreat shall be evaluated considering not only historical bluff retreat data, but also acceleration of bluff retreat made possible by continued and accelerated sea level rise, future increase in storm or El Niño events, the presence of clean sands and their potential effect on the pattern of erosion at the site, an analysis of the ongoing process of retreat of the subject segment of the shoreline, and any known site-specific conditions."

e. **Laguna Beach LCP (2013; LCP-LGB-MAJ-1-10)**. Action 10.2.6 states, "Require all new development located on an oceanfront bluff top to be setback from the oceanfront bluff edge a sufficient distance to ensure stability, ensure that it will not be endangered by erosion, and to avoid the need for protective devices during the economic life of the structure (75 years). Such setbacks must take into consideration expected long-term bluff retreat over the next 75 years, as well as slope stability. The predicted bluff retreat shall be evaluated considering not only historical bluff retreat data, but also acceleration of bluff retreat made possible by continued and accelerated sea level rise, future increase in storm or EI Nino events, and any known site-specific conditions. To assure stability, the development must maintain a minimum factor of safety against landsliding of 1.5 (static) or 1.2 (pseudostatic, k=0.15 or determined through analysis by the geotechnical engineer) for the economic life of the structure."

f. **Crescent City LCP (2011; LCP-CRC-MAJ-1 03)**. Section 7.B.4. states "Siting and design of new blufftop development and shoreline protective devices shall take into account anticipated future changes in sea level. In particular, an acceleration of the historic rate of sea level rise shall be considered. Development shall be set back a sufficient distance landward and elevated to a sufficient foundation height to eliminate or minimize to the maximum extent feasible hazards associated with anticipated sea level rise over the expected 100-year economic life of the structure, taking into consideration the 100-year storm event and storm surge."

g. **Fort Bragg LCP/General Plan (2008; LCP-FTB-MAJ-1-06).** Policy SF (Safety)-1.5 states, "Siting and design of new blufftop development and shoreline protective devices shall take into account anticipated future changes in sea level. In particular, an acceleration of the historic rate of sea level rise shall be considered. Development shall be set back a sufficient

distance landward and elevated to a sufficient foundation height to eliminate or minimize to the maximum extent feasible hazards associated with anticipated sea level rise over the expected 100-year economic life of the structure."

h. **San Luis Obispo County LCP (2007; LCP-SLO 1-06).** Appendix A1 states, "Development shall be set back a minimum distance equal to the distance from the bluff edge to the 1.5 factor-of-safety-line, plus the distance that the bluff might reasonably be expected to erode over 100 years. These determinations, to be made by a state-licensed Certified Engineer Geologist, Registered Civil Engineer, or Geotechnical Engineer, shall be based on a site-specific evaluation of the long-term bluff retreat rate at this site and shall include an allowance for possible acceleration of historic bluff retreat rates due to sea level rise."

5. Elevation of development. Examples of Commission-certified LCPs that include requirements for structures in hazardous areas to be elevated above the Base Flood Elevation to account for sea level rise, similar to Suggested Modifications No. 6, 9, and 19. (Note, these Suggested Modifications call for this additional elevation to be implemented if feasible, *or* for the structure to be built in a way that ensures elevation can be implemented later, when necessary).

   a. **City of Half Moon Bay LUP (2021; LCP-2-HMB-20-0081-2):** Section 7, Environmental Hazards, Policy 7-55 states, "Prohibit habitable space at elevations subject to flood risk. New development that must be located in areas subject to current or future flooding shall be sited and designed to be capable of withstanding such impacts in compliance with FEMA, NFIP, and Coastal Act requirements. This shall include elevating all finished floor elevations at least 2 feet above the 100-year flood event, taking into account future climate change and projected storm events. Allow retrofitting for existing development in areas subject to current or future flood, including through elevation of habitable areas, use of break-away walls, etc. Ensure that flood protection measures are consistent with the visual and other coastal resource protection policies of this LCP in the siting and design of raised development and other adaptation measures.

   b. **City of Santa Barbara Land Use Plan (2019; LCP-4-SBC-18-0062-1)**: Policy 5.1-28 states, "New development and substantial redevelopment shall meet the following requirements over the expected life of the development, factoring in the effects of sea level rise: A. Avoid high flood hazards where feasible; B. Where avoidance of high flood hazards cannot be feasibly achieved, minimize flood risk by increasing elevation of structures…."

   c. **Laguna Beach LCP (2013; LGB-MAJ-1-10)**. Section 25.38.041 states, "The duties and responsibilities of the floodplain administrator shall include, but not be limited to, the following: [...] (C) Review, Use and Development of Other Base Flood Data. (1) When base flood elevation data have not been provided in accordance with Section 25.38.030 or the future flood elevation

data have not been modified to reflect best available science related to sea level rise, the Floodplain Administrator shall obtain, review, and reasonably utilize any base flood elevation and floodway data available from a federal or state agency, or other source, in order to administer Sections 25.38.050 through 25.38.057. (2) When the base flood elevation data have not been modified to reflect future sea level rise, the Floodplain Administrator shall develop a sea level rise adjusted base flood elevation, as defined in Section 25.38.020 of this chapter, in order to administer subsection (A)(3)."

d. **Crescent City LCP (2011; CRC-MAJ-1 03).** Policy 7B states, "Development shall be set back a sufficient distance landward and elevated to a sufficient foundation height to eliminate or minimize to the maximum extent feasible hazards associated with anticipated sea level rise over the expected 100-year economic life of the structure, taking into consideration the 100-year storm event and storm surge."

6. Best available science. Examples of Commission-certified LCPs that require the use of the current best available science on sea level rise, similar to Suggested Modification No. 8.

   a. **City of Pacific Grove (2020; LCP-3-PGR-18-0093-1):** Policy HAZ-12 states that development proposed in potential hazard areas shall be evaluated for potential hazards based on all readily available information and best available science and further requires a site specific hazard report to be prepared by a qualified geologist/engineer if the initial evaluation determines hazards may occur over the life of the proposed development.

   b. **City of Half Moon Bay LUP (2021; LCP-2-HMB-20-0081-2):** Section 7, Environmental Hazards discusses the current best available science in narrative form and includes several references to best available science in policies, including 7-10, 7-11, and 7-12. For example, Policy 7-10 states, "Maintain and update shoreline hazard maps to incorporate significant updates in best available science and information when such significant updates are available, including areas subject to wave action, flooding, tsunamis, and erosion due to sea level rise."

   c. **City of Santa Barbara Land Use Plan (2019; LCP-4-SBC-18-0062-1)** includes several policies that reference the use of the current best available science on sea level rise, including Policies 5.1-63 through 5.1-68. For example, Policy 5.1-19 states, "New development and substantial redevelopment shall consider the expected life of proposed development in conjunction with the best available information on climate change effects, particularly sea level rise, and incorporate adaptation measures, as needed, in the location, siting, and design of structures."

   d. **San Clemente Land Use Plan (2018; LCP-5-SCL-16-0012-1):** Policy HAZ-17 states, "The best available scientific information regarding sea level rise projections and effects shall be considered in the preparation of findings and

recommendations for all geologic, geotechnical, hydrologic, coastal hazards, and engineering investigations. Current best available scientific information shall be reflective of the most current Coastal Commission guidance, and peer reviewed studies that are widely accepted within the scientific community and locally relevant. Support scientific studies that increase and refine the body of knowledge regarding potential sea level rise in San Clemente, and possible response to it." Policies HAZ-8, 9, 15, 16, and 29 also reference best available science.

e. **San Francisco Certified LCP (2018; LCP-2-SNF-18-0028-1).** Policy 12.2 states, "Sea level rise and erosion threaten San Francisco's coastal resources and their impacts will worsen over time. San Francisco shall use the best available science to support the development of adaptation measures to protect our coastal resources in response to sea level rise and coastal hazards. […]"

f. **Ocean Beach Community Plan (2016; LCP-6-OCB-15-0006-1).** Policy 7.6.1 states, "Development shall use the most current and best available scientific research data available when assessing climate change and sea level rise."

g. **Santa Monica Mountains LCP (2014; LCP-4-LAC-14-0109-4).** Section 22.44.2190.E states, "Best Available Science on sea level rise shall be updated, in keeping with regional policy efforts, as new, peer-reviewed studies on sea level rise become available and as agencies such as the OPC or the CCC issue updates to their guidance reports."

h. **Crescent City LCP (2011; CRC-MAJ-1 03)**. Section 7.A.3 states, "The best available and most recent scientific information with respect to the effects of long-range sea level rise shall be considered in the preparation of findings and recommendations for all requisite geologic, geotechnical, hydrologic, and engineering investigations. Residential and commercial development at nearshore sites shall analyze potential coastal hazards from erosion, flooding, wave attack, scour and other conditions, for a range of potential sea level rise scenarios, from three to six feet per century. […]"

7. Assumption of risk and disclosures. Examples of Commission-certified LCPs that require applicants to record a document assuming the risks of developing in a potentially hazardous area, similar to Suggested Modifications No. 10 and No. 18.

   a. **City of Half Moon Bay LUP (2021; LCP-2-HMB-20-0081-2):** Section 7, Environmental Hazards, Policy 7-4 states, "Disclosure of Hazard Presence. Require, as a condition of approval for a coastal development permit on property containing any shoreline, geologic, flood, or fire hazards, the recordation of a deed restriction to ensure the current and any future owners of the property understand the presence and assume the risks of such hazards and any property defects or vulnerabilities related to such hazards,

including information about known current and potential future vulnerabilities to hazards as may be exacerbated by climate change and sea level rise."

Policy 7-18 also states, "7-18. Assumption of Risk. As a condition of approval for all coastal development permits that may be subject to shoreline hazards, require a deed restriction to ensure that property owners understand and assume the risks, and mitigate the coastal resource impacts, of new development and redevelopment in a hazardous area. Recorded assumptions of risk shall include a waiver of claim of damage or liability against the City of Half Moon Bay, waiver of rights to future shoreline armoring, acknowledgement that the development may need to be removed and the site restored in response to future hazard conditions, and any other acknowledgements and mitigation measures necessary to internalize risk decisions. In the event that development is threatened by shoreline erosion or other hazards and needs to be removed or relocated, the owner shall bear full responsibility for all costs and must work with the City to implement the mitigation in a timely manner."

b. **City of Pacific Grove (2020; LCP-3-PGR-18-0093-1):** Haz-9 states in part, "As a condition of approval for all coastal development that at some point during its lifetime may be subject to coastal hazards, the Applicant shall record a deed restriction against the properties involved in the application acknowledging that the development site may be subject to coastal hazards."

c. **City of Santa Barbara Land Use Plan (2019; LCP-4-SBC-18-0062-1)**: Policy 5.1-42 require applicants within the Interim Shoreline Hazards Screening Areas or other hazardous areas to record a deed restriction assuming the risks associated with the permitted development, acknowledging removal may be required, waiving rights to future shoreline protective devices (if applicable per Policy 5.1-44), acknowledging services to the site may not be able to be maintained, etc.

d. **City of Santa Barbara Land Use Plan (2019; LCP-4-SBC-18-0062-1):** Policy 5.1-17 states, "Support legislation to include the risks of sea level rise and shoreline hazards on real estate disclosures included in the sales of property."

e. **San Clemente Land Use Plan (2018; LCP-5-SCL-16-0012-1):** Policy HAZ-10 states, "…record a document (i.e., deed restriction) that waives and indemnifies the approving entity from liability for any personal or property damage caused by geologic, coastal or other hazards on such properties in relation to any development approved by the CDP and acknowledging that future shoreline protective devices to protect structures authorized by such a CDP are prohibited as outlined in HAZ-18 […]"

8. <u>Definition of substantial improvement (also commonly called redevelopment)</u>. Examples of Commission-certified LCPs with definitions of substantial development (or redevelopment), similar to Suggested Modification No. 16.

a. **City of Half Moon Bay LUP (2021; LCP-2-HMB-20-0081-2):** Section 7, Environmental Hazards, defines "redevelopment" as "alteration, demolition, or replacement of 50 percent or more of the major structural components of any structure, or an addition of 50 percent or more to the floor area of such structure. Incremental changes that cumulatively amount to replacement of 50 percent or more over time shall also be considered redevelopment. In all cases, policies that apply to 'new development' shall also apply to 'redevelopment.'"

b. **City of Santa Barbara Land Use Plan (2019; LCP-4-SBC-18-0062-1):** Policy 2.1-27 includes a definition of substantial redevelopment that relies on 50% replacement, alteration, or removal of structural elements of the roof, roof framing, exterior walls, or foundation system cumulatively following the date of certification of the Land Use Plan. (Please consult the policy for the exact language.)

c. **San Clemente Land Use Plan (2018; LCP-5-SCL-16-0012-1)** defines "Major Remodel" as "Alteration of 50% or more of major structural components including exterior walls, floor and roof structure, and foundation, or a 50% increase in floor area" either in one project or cumulatively when considering previous development approved on or after January 1, 1977. (Please consult the LUP for the exact language.)

d. **Solana Beach Land Use Plan (2014; LUPA SOL-MAJ-1-13):** states, "Bluff Top Redevelopment shall apply to proposed development located between the sea and the first public road paralleling the sea (or lagoon) that consists of alterations including (1) additions to an existing structure, (2) exterior and/or interior renovations, (3) and/or demolition of an existing bluff home or other principal structure, or portions thereof, which results in: (a) Alteration of 50% or more of major structural components including exterior walls, floor and roof structure, and foundation, or a 50% increase in floor area. Alterations are not additive between individual major structural components; however, changes to individual major structural components are cumulative over time from the date of certification of the LUP. (b) Demolition, renovation or replacement of less than 50% of a major structural component where the proposed alteration would result in cumulative alterations exceeding 50% or more of a major structural component, taking into consideration previous alterations approved on or after the date of certification of the LUP; or an alteration that constitutes less than 50% increase in floor area where the proposed alteration would result in a cumulative addition of greater than 50% of the floor area taking into consideration previous additions approved on or after the date of certification of the LUP.

9. Subdivisions in hazardous areas. Examples of Commission-certified LCPs with policies on subdivisions in a potentially hazardous area, similar to Suggested Modification No. 17.

a. **City of Half Moon Bay LUP (2021; LCP-2-HMB-20-0081-2):** Section 7, Environmental Hazards, Policy 7-2 states, “Limit subdivisions in areas vulnerable to environmental hazards, including as may be exacerbated by climate change, by prohibiting any new land divisions, including subdivisions, lot splits, and lot line adjustments that create new building sites unless specific criteria is met that ensure that when the subject lots are developed, the development will not be exposed to hazards, pose any risks to protection of coastal resources, or create or contribute to geologic instability.”

b. **San Clemente Land Use Plan (2018; LCP-5-SCL-16-0012-1):** Policy HAZ-34 states, “Subdivision. Any subdivision of property shall be reviewed for consistency with LCP policies. New parcels that do not have an adequate building site area to comply with the setback standards and other hazard avoidance provisions of these policies shall not be created.”

10. LCP amendment for future program. Examples of Commission-certified LCPs with policies that require future LCP amendments to implement new or changed policies or programs, similar to Suggested Modification No. 7.

    a. **City of Santa Barbara Land Use Plan (2019; LCP-4-SBC-18-0062-1):** Several policies acknowledge that changes to policies, maps, or city programs could require future LCP updates (e.g., 1.2-4, 2.1-5, 3.2-4, 4.2-11, 5.1-15, 5.1-69)

    b. **San Clemente Land Use Plan (2018; LCP-5-SCL-16-0012-1):** Several policies acknowledge that changes to policies, maps, or city programs could require future LCP updates (e.g., LU-34, Haz-12, and the Introduction to Chapter 2.1)