

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT
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W17a

Prepared September 5, 2023 for September 6, 2023 Hearing

To: Commissioners and Interested Persons

From: Kevin Kahn, Central Coast District Manager
Nolan Clark, Coastal Planner

**Subject: Additional hearing materials for W17a
LCP Amendment Number LCP-3-SCO-23-0004-1-Part B (Sustainability
Update) Time Extension**

This package includes additional materials related to the above-referenced hearing item as follows:

Additional correspondence received in the time since the staff report was distributed.



County of Santa Cruz

COUNTY ADMINISTRATIVE OFFICE

701 OCEAN STREET, SUITE 520, SANTA CRUZ, CA 95060-4073

(831) 454-2100 FAX: (831) 454-3420 TDD/TTY: call 711

CARLOS J. PALACIOS, COUNTY ADMINISTRATIVE OFFICER

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Agenda Item 17a
Sept. 6, 2023 Meeting

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

SEP 01 2023

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Delivered via email to:
Kevin Kahn, Central Coast District Manager

Subject: Request for Reduced Extension of Time Limit for Commission Action on Santa Cruz County Local Coastal Program (LCP) Amendment Number LCP-3-SCO-23-0004-1-Part B (Sustainability Update)

Dear Commissioners:

I trust this letter finds you well. I am writing on behalf of the County of Santa Cruz regarding the review of Santa Cruz County's proposed Local Coastal Program (LCP) Amendment Number LCP-3-SCO-23-0004-1-Part B, also known as the "Sustainability Update." We recognize and appreciate the California Coastal Commission's dedication to safeguarding the coastal environment while fostering sustainable development practices, and respectfully request that should an extension of the review period be granted, it should be shorter than one year and preferably not extend beyond the current calendar year for reasons outlined below.

We acknowledge the comprehensive nature of the proposed LCP amendment, which seeks to update the Land Use Plan (LUP) and Implementation Plan (IP) of Santa Cruz County's LCP. The amendment's primary focus on sustainability principles, mixed-use development, smart and resilient growth, primarily in urban areas along existing transportation corridors, reflects the County's commitment to balanced, sustainable, and responsible growth within and beyond the Coastal Zone. Furthermore, the County has worked collaboratively with Coastal Commission staff to understand and assess the changes incorporated within the Sustainability Update, and are committed to continuing this partnership as Coastal Commission staff carry out their duties under the Coastal Act Section 30510.

The proposed changes have implications that directly impact the County's ability to address the pressing needs of its community, including housing supply and affordability, transit-friendly development, and economic vitality. Furthermore, because it was not logistically possible to bifurcate the General Plan and code updates incorporated in the Sustainability Update, the entire countywide implementation of this important General Plan revision is suspended pending the Commission's review of changes applying in the Coastal Zone.

Given the complexity and significance of the proposed LCP amendment, we acknowledge the necessity for an extension of the review deadline. However, we kindly request that the extended deadline be as expeditious as possible, ideally no later than December of this year. The County's ability to move forward with critical initiatives such as implementation of the 2023 Housing Element Update, required by State law, could be delayed significantly by a lengthy Coastal Commission review process. Implementation of the forthcoming Housing Element Update is critical in Santa Cruz County – by some measures the least affordable place to live in the U.S. – given the County's 6th Cycle Regional Housing Needs Allocation (RHNA) of 4,634 units.

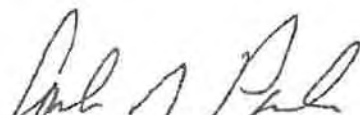
The County has eight years in which to plan for and permit the RHNA for the 6th Housing Element Cycle. The planning period for the 6th Cycle began July 1, 2023, and runs through December 2031. If the Commission does not approve the County's Sustainability Update until October 2024, the County will effectively lose a year and a half, or nearly 20 percent of the time in the 6th Cycle, in which to implement its 2023 Housing Element policies, many of which rely on the updated and more sustainable and climate adaptation-friendly development standards and land use policies in the Sustainability Update. Multiple State agencies are monitoring local governments' compliance with Housing Element law and their progress toward meeting RHNA goals, including the State Attorney General and the Accountability Unit in the Department of Housing and Community Development (HCD). Not only could delays imperil Santa Cruz County's ability to meet community housing needs and the needs of public/private employers to have improved housing access for their workforces, but delays could lead to enforcement actions, loss of various state funding opportunities, litigation, and/or the "Builder's Remedy," among other serious ramifications. The Commission's timely review of the Sustainability Update would help ensure that the community's needs are met and that essential projects can commence in a timely manner.

We propose that while allowing for a thorough analysis of the proposed changes, a shorter extension of the review deadline would enable the County to timely implement policies that align with both the Coastal Act's mandates, State Housing Element law, and the community's interests. This approach strikes a balance between careful evaluation and expeditious action.

In conclusion, we respectfully urge the California Coastal Commission to consider our request for a deadline extension that aligns with the County's urgency to initiate important projects. We appreciate the Commission's dedication to preserving our coastal resources and promoting sustainable development, and we trust that your decision will reflect a balanced approach that benefits both the environment and the community.

Thank you for your attention to this matter. We look forward to your timely response.

Sincerely,



Carlos J. Palacios
County Administrative Officer

Agenda Item 17a, Sept. 6, 2023 Meeting - MidPen Housing Comment

Nevada Merriman <nmerriman@midpen-housing.org>

Fri 9/1/2023 4:33 PM

To:CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Cc:Joanna Carman <joanna.carman@midpen-housing.org>

Dear Commissioners,

I am writing on behalf of MidPen Housing regarding the review of Santa Cruz County's proposed Local Coastal Program (LCP) Amendment Number LCP-3-SCO-23-0004-1-Part B, also known as the "Sustainability Update." MidPen Housing is one of the nation's leading nonprofit developers, owners and managers of high-quality affordable housing and onsite resident services. Since MidPen was founded in 1970, we have developed over 125 communities and 8,300 homes for low-income families, seniors, including homeless families and individuals and those with supportive housing needs throughout the San Francisco and Monterey Bay Areas of California.

We recognize the California Coastal Commission's ("the Commission") dedication to safeguarding the coastal environment while fostering sustainable development practices. We further appreciate that the Commission has stated the importance of coastal access and housing affordability within its jurisdiction. With this in mind, we respectfully request that should an extension of the review period be granted, it should be shorter than one year and preferably not extend beyond the current calendar year.

We acknowledge both the comprehensive nature of the proposed LCP amendment, and its impact on many critical local planning and real estate development timelines that flow downstream from the completion of the LCP amendment review and adoption exercise, including the 2023 Housing Element Updates, of which nearly every jurisdiction in the State is diligently working to complete. The proposed changes have implications that directly impact the ability to address the pressing housing supply and affordability needs.

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Given the complexity and significance of the proposed LCP amendment, we acknowledge the necessity for an extension of the review deadline. However, we kindly request that the extended deadline be as expeditious as possible, ideally no later than December of this year. We also request careful attention to the numerous steps associated with finalizing the proposed LCP amendment. Should the decision to grant the full year carry the day, we realistically anticipate that important downstream planning and development activity will stall until early 2025. A shorter extension of the review deadline would align with the Coastal Act's mandates, State Housing Element law, and the urgent need to meet the community's housing needs.

Nolan ✓

Fwd: Public Comment on September 2023 Agenda Item Wednesday 17a - Santa Cruz County LCP Amendment No. LCP-3-SCO-23-0004-1-Part B (Sustainability Update) Time Extension Only.

CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Sun 8/27/2023 5:41 PM

To:Clark, Nolan@Coastal <nolan.clark@coastal.ca.gov>

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From: Rose Marie McNair <realrose@norcalbroker.com>

Sent: Saturday, August 26, 2023 2:35:13 PM

To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Subject: Public Comment on September 2023 Agenda Item Wednesday 17a - Santa Cruz County LCP Amendment No. LCP-3-SCO-23-0004-1-Part B (Sustainability Update) Time Extension Only.

Aug. 26, 2024

Honorable Commissioners:

Santa Cruz County has submitted an LCP amendment request to update the Land Use Plan and accompanying Implementation Plan, and as stated the proposed LCP amendment application was filed and complete on May 24, 2023, but due to additional scheduling issues for final action, Coastal Act Section 30517 provides an extension for "good cause", which now requires flexibility of time to clarify permitting and zoning regulation changes. These changes require analysis to create various drafted additions to the LCP amendments. Please allow a YES vote to the motion to extend Santa Cruz County's time limit to act on the LCP amendment by October 2, 2024.

Thank you for your consideration,
Rose Marie McNair, Broker



Rose Marie McNair, Broker

McNair Real Properties

1715-42nd Ave. "B"

Capitola, CA 95010

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