

CALIFORNIA COASTAL COMMISSION

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



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Prepared February 23, 2024 for March 15, 2024 Hearing

To: Commissioners and Interested Persons

From: Kevin Kahn, Central Coast District Manager
Ryan Moroney, Central Coast District Supervisor
Sarah MacGregor, Coastal Planner

**Subject: City of Morro Bay LCP Amendment Number LCP-3-MRB-22-0059-2
(Morro Bay IP Update)**

SUMMARY OF STAFF RECOMMENDATION

The City of Morro Bay is proposing a complete update of its Local Coastal Program (LCP) Implementation Plan (IP). This LCP amendment is the second part of a complete LCP update following the Commission's certification of the updated LUP in August 2021. The existing IP was certified along with the prior LUP in 1984 with several amendments since then. Thus, the IP is well overdue for a refresh both to ensure consistency with the 2021 certified LUP and to reflect more modern standards associated with contemporary coastal land use planning issues. Commission staff and City staff have been working cooperatively throughout the LCP update process, which was partially funded via three grants from the Coastal Commission's LCP Local Government Assistance Grant Program and has been the subject of an extensive and inclusive community planning process, which commenced in earnest in 2015. The end result was a robust set of detailed policy prescriptions addressing a host of coastal resource issues in Morro Bay, and which culminated in the Commission's unanimous approval of the LUP as submitted. Since that time, both staffs turned attention to the corresponding IP component, and the result of that collaboration is the proposed IP as part of this amendment request, which, as detailed in this report, staff similarly recommends the Commission certify as submitted.

The City of Morro Bay and its over 10,000 residents are located within San Luis Obispo County between the unincorporated communities of Los Osos to the south and Cayucos to the north, and about halfway between San Francisco and Los Angeles on California's Central Coast. Almost the entire roughly six square mile City is located within the coastal zone, with only about 14 acres in the northern hill portion of the City outside of the coastal zone. The City is bisected by Highway 1 paralleling the shoreline, and consists of a mixed-use Downtown area centered along Main Street and Morro Bay Boulevard leading to the Embarcadero. The Embarcadero is the City's primary tourist destination and also a working waterfront comprised of a mix of visitor-serving, public

recreational access, and coastal-dependent development. Residential uses are dominant in the northern part of the City, as well as in and around the Downtown and Embarcadero areas. Just upcoast of the Embarcadero is the iconic Morro Rock and broad sandy beaches stretching to the northern City limit. Downcoast of the Embarcadero are coastal bluffs, low-lying marshes, and Morro Bay itself, which is a federally designated Estuary of National Significance. Morro Bay State Park and open agricultural hillsides surround the City's inland developed periphery, forming a scenic greenbelt around the more developed urban core.

As previously stated, the proposed IP is a complete overhaul of the existing IP to carry out the provisions of the updated LUP. The LUP's overarching intent is to form a greenbelt surrounding the urban core by protecting the City's undeveloped hillsides and mostly unarmored beaches and bluffs, while also correspondingly providing for mixed-use infill development and multi-modal transportation options within the already urbanized City core, including in downtown and along the Embarcadero. To implement such goals, the LUP includes a quite specific and directive set of policies aimed at protecting sensitive coastal resources, including in terms of public coastal access, coastal hazards, sensitive habitats, and public views. These policies provide the ultimate performance standard (e.g., ensure new development does not include any form of armoring, prohibit residential development within wetlands and ESHA, protect public blue water coastal views, etc.), and the proposed IP carries these provisions out through required studies, technical reports, and other implementation techniques. For example, the LUP protects wetlands and other sensitive habitats by limiting the types of development in such areas and through requisite buffers. The IP maintains these overarching requirements and carries them out by specifying the procedural protocols to do so, including through the preparation of biological reports from qualified professionals that, among other things, identify specific siting and design techniques, specific buffer widths, and any restoration/mitigation components. Similarly, with respect to coastal hazards, the LUP requires development to be safe from coastal hazards risk, only allows for armoring to protect existing structures in danger from erosion, requires a series of coastal resource mitigation requirements for permissible armoring, and requires armoring to be removed should a structure be redeveloped. The proposed IP maintains and carries forward all such LUP provisions and provides the necessary details to implement the LUP policies by requiring certain technical studies that evaluate alternatives and mitigation measures, including identifying the potential impacts of erosion, flooding, tidal scour, and the sea level rise over the life of the development. Finally, with respect to facilitating infill development and housing, the IP provides for a suite of provisions to promote housing opportunities, including affordable housing, and similarly incentivizes multi-modal transportation options and flexible parking requirements, all in conformance with LUP policies.

When viewed in this light, the proposed IP doesn't introduce new policy concepts from what the LUP already requires, but rather reinforces such provisions and includes the criteria and metrics to carry them out. In sum, the proposed IP contains a plethora of standards to guide development while ensuring the highest protection of coastal resources. The proposed IP will effectively implement the City's LUP and provide a

framework for economic and social growth in the City while protecting the City's unique and sensitive coastal resources.

It should also be noted that this amendment also proposes to slightly modify the LUP's land use map by changing the land use designation for three properties. As explained in more detail in the report, these changes are to fix inadvertent mapping errors from the 2021 LUP update, and the amendment simply changes them back to their previous designation. Staff too recommends approval of these changes as submitted.

As noted above, throughout the local process, the City has worked very closely with Commission staff on all aspects of the proposed IP update. In fact, City and Commission staffs have worked collaboratively and iteratively on draft versions of the proposed IP update and have consistently met and communicated prior to and throughout the City's public hearing process to understand issues, best practices, and needs, including in light of substantial and substantive public input. The result of this robust and inclusive process is a thorough and comprehensive proposed IP that will serve to implement the policies of the LUP and provide a framework for coastal development and enhanced coastal resource protection.

Thus, staff believes that the proposed LUP amendment and IP update is consistent with the Coastal Act and consistent with and adequate to carry out the City's LUP, respectively, and that the Commission should **approve both the LUP and IP update as submitted** and without any modifications. This recommendation is borne from, and is the fruit of, the coordination process between the City, the public, and Commission staff. It is reflective of the success which results from collaboration and is a model to be emulated up and down the state in the coastal zone. The motion to implement staff's recommendation is found on **page 5** below.

Staff Note: LCP Amendment Action Deadline

This proposed LCP amendment was filed as complete on January 22, 2024. The proposed amendment affects both the LCP's LUP and IP, and the 90-working-day action deadline is May 30, 2024. Thus, unless the Commission extends the action deadline (it may be extended by up to one year), the Commission has until May 30, 2024 to take a final action on this LCP amendment.

Therefore, if the Commission fails to take a final action in this case (e.g., if the Commission instead chooses to postpone/continue LCP amendment consideration), then staff recommends that, as part of such non-final action, the Commission extend the deadline for final Commission action on the proposed amendment by one year. To do so, staff recommends a YES vote on the motion below. Passage of the motion will result in a new deadline for final Commission action on the proposed LCP amendment. The motion passes only by an affirmative vote of a majority of the Commissioners present.

Motion: I move that the Commission extend the time limit to act on City of Morro Bay Local Coastal Program Amendment Number LCP-3-MRB-22-0059-2 to May 30, 2025, and I recommend a yes vote.

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EXHIBITS

Exhibit 1: Proposed Land Use Map Amendment

Exhibit 2: Proposed IP

Exhibit 3: Proposed Zoning Map

1. MOTION AND RESOLUTION

Staff recommends that the Commission, after public hearing, **certify the proposed LCP amendment as submitted**. The Commission needs to make one motion on the LUP amendment and one motion on the IP amendment in order to act on this recommendation.

A. Certify the LUP Amendment as Submitted

Staff recommends a **YES** vote on the following motion. Passage of this motion will result in certification of the Land Use 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 to Certify: *I move that the Commission certify Land Use Plan amendment LCP-3-MRB-22-0059-2 as submitted by the City of Morro Bay, and I recommend a **yes** vote.*

Resolution to Certify: *The Commission hereby certifies Land Use Plan amendment LCP-3-MRB-22-0059-2 for the City of Morro Bay and adopts the findings set forth below on the grounds that the amended Land Use Plan conforms with, and is adequate to carry out, the policies of Chapter 3 of the Coastal Act. Certification of the amended Land Use Plan 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 amended Land Use 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.*

B. Certify the IP Amendment as Submitted

Staff recommends a **NO** vote on the following motion. Failure of this motion will result in certification 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 Commissioners present.

Motion to Certify: *I move that the Commission reject Implementation Plan amendment LCP-3-MRB-22-0059-2 as submitted by the City of Morro Bay, and I recommend a **no** vote.*

Resolution to Certify: *The Commission hereby certifies Implementation Plan amendment LCP-3-MRB-22-0059-2 for the City of Morro Bay and adopts the findings set forth below on the grounds that the amended Implementation Plan conforms with, and is adequate to carry out, the provisions of the certified Land Use Plan. Certification of the amended Implementation Plan 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 amended 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.

2. FINDINGS AND DECLARATIONS

A. Proposed LCP Amendment Description

The existing Implementation Plan (IP) was originally fully certified, with the City assuming coastal development permitting (CDP) authority, by the Commission in 1984. Although the LCP has served the City well, like many of the first wave of LCPs that the Commission certified in the early 1980s, the current LCP is in need of updating to reflect more modern understandings associated with contemporary coastal land use planning issues. As such, in the mid-2010s, the City began the process of comprehensively updating both its LUP and IP, including in response to grant monies provided by the Commission and Ocean Protection Council.¹ The City began the public outreach process for the LUP update in 2015. City and Commission staff worked together in an inclusive public process to explore policy concepts and best practices to address the particular coastal resource issues facing Morro Bay, with an overarching intent of protecting the City's undeveloped hillsides and mostly unarmored beaches and bluffs, while also providing for mixed-use infill development and multi-modal transportation options within the already urbanized City core. The end result of this multi-year collaboration was the City's submittal to the Commission of a comprehensive LUP update, and the Commission unanimously approving it as submitted in August 2021.²

Subsequent to the LUP's certification, the City turned its efforts to the IP so as to implement the revised LUP, including its coastal resource protection standards and land use designations. As discussed in more detail subsequently, overall, the proposed IP can be summarized in three parts. One part specifies general site planning by implementing corresponding LUP land use designations with accompanying zoning districts, and in each zoning district identifying the allowed land uses and physical development standards (e.g., height, mass, and setback requirements) for particular land use types. The second component includes a plethora of coastal resource protection standards to implement the strong policy language specified in the LUP, including policies governing lower-cost visitor-serving accommodations, environmentally sensitive habitats, visual resources protection, coastal hazards, and public coastal access. Generally, these proposed IP provisions serve to implement the corresponding LUP policy through required studies, findings, and other procedural mechanisms as part of CDP review processes. And lastly, the IP includes the regulatory processes for the City to carry out its CDP review program, including provisions that specify the types of CDPs, exemptions, reviewing bodies, appeal procedures, and enforcement, along with various definitions in the glossary section.

¹ The City received three grants from the Commission's LCP Local Assistance Grant Program for its LCP update efforts.

² LCP-3-MRB-21-0047-1.

Finally, this LCP amendment also includes a Land Use Plan amendment consisting of a land use designation change for three parcels, which is discussed in more detail below, but essentially serves to correct a few minor land use designation errors made in the prior LUP update.

Land Use Plan Amendment

The proposed LUP amendment will amend the land use map for three parcels, two of which are oceanfront parcels located at the northern end of the City immediately south of what is known as Morro Bay Dog Beach (APNs 065-022-009 and 065-022-011³). The third parcel is located on the eastern side of Highway 1 on Preston Lane just south of Little Morro Creek (APN 068-183-026). The proposed amendment will remedy an error from the 2021 LUP update which inadvertently changed the land use designation of these three parcels. The two oceanfront parcels' land use designation will be changed from Agriculture back to their original and intended Open Space land use designation, including because these parcels form part of a popular open space area. The third parcel's land use designation will be changed from Moderate Density Residential to General Light Industrial, which is consistent with adjacent parcels in this built-out industrial area inland of Highway 1.⁴

See **Exhibit 1** for the proposed land use map amendment.

Implementation Plan Amendment

As noted, the proposed LCP amendment is a comprehensive update to the IP. The most prominent change to the structure of the proposed IP is the fact that the IP will only be a portion of the City's broader Zoning Code (whereas the existing IP and Zoning Code were one and the same). The intent with this new construct is to better target the regulatory components that serve as standards of review for CDP purposes, particularly the issues that address coastal resource protection, rather than issues that fall outside of such scope and are issues under the City's broader health and safety police powers. The end result is a 'leaner' IP that can also reduce the need for LCP amendments for issues that do not affect coastal resource protection.

And substantively, as a whole, the certified LUP is quite detailed, prescriptive, and directive in terms of the standards governing new development so as to protect coastal resources. The primary goal of the IP is to carry out those detailed policy directives through specific standards to guide implementation, including through requisite studies, findings, and procedures.

Zoning District Development Standards and Allowable Uses

The proposed IP includes the standards necessary to carry out the LUP by providing the protocols that proposed projects must meet during the CDP application review process to ensure that development avoids and/or minimizes impacts to coastal resources. The proposed IP implements corresponding LUP land use designations through a zoning map which dictates the zoning district for every parcel in the City. The

³ APN 065-022-011 is owned by the City, and APN 065-022-009 is owned by the Chevron Corporation.

⁴ The parcels are currently zoned correctly, and thus no changes are proposed as part of the zoning map.

proposed IP's zoning districts are generally grouped under the following umbrella categories: agricultural, residential, commercial and mixed use, industrial, public and semi-public, and waterfront/harbor area districts. The agricultural district specifies the intensity of development allowed on parcels with corresponding LUP agricultural designations on the periphery of town, and specifies, among other things, minimum lot size and maximum density requirements, as well as general protocols for the protection of agricultural lands. The residential district includes five zones varying from residential low density, which allows 4 dwelling units per acre, up to residential high density, which allows up to 27 dwelling units per acre and is generally reserved for the more urban parts of town, including along primary arterial streets. The commercial and mixed-use districts include five zones prescribing various intensities of commercial uses and seek to appropriately locate commercial uses throughout the City with the goal of promoting pedestrian-oriented mixed-use commercial centers at appropriate locations. The public and semi-public districts provide for recreational spaces such as schools and hospitals, as well as parks suitable for more intensive recreational pursuits such as campgrounds and picnic areas. The open space zone is applied to the more rural and pastoral undeveloped habitat and natural resources areas in the City (e.g., the City's beaches and the Morro Bay Estuary). The waterfront and harbor districts provide standards related to the placement of floating docks, maintenance dredging, and public access requirements, among other things, along the City's working waterfront along the Embarcadero. For each of the IP's six umbrella zoning districts, the IP includes a use chart that provides land use regulations pertaining to the allowed uses in each zone and specifies the type of permit that is required for each use in addition to a CDP, such as a conditional use permit or some other type of local discretionary authorization.

Additionally, the IP provides development guidelines for seven overlay districts in the City. The intent of such overlays is to provide additional development standards that apply to a particular site, and that supersede the base zoning district's standards in case of any conflict. The Cloisters Overlay District sets standards for residential development and public open space within the Cloisters Subdivision, located in northern Morro Bay and west of Highway 1, including maximum residential height standards and maximum lot coverage that are specific to this unique neighborhood with its own particular coastal resource protection requirements (these standards are largely unchanged from the existing IP). The Sea Level Rise overlay establishes areas of the City where potential sea level rise-related impacts are expected in 2100 and serve as a baseline mapped trigger for when development proposed in such area must include required technical studies to ensure stability, structural integrity, and overall safety from coastal hazards risk. The Cultural Resources overlay indicates the parcels where there are known or expected tribal/archaeological resources and where particular protocols to protect such resources are required. The Mixed Use Residential Overlay District allows for residential development on parcels zoned Visitor Serving Commercial and Neighborhood Commercial in conjunction with commercial development, and is generally located on parcels north of downtown as established on the proposed zoning map. The Waterfront Master Plan Overlay District requires all development located

within the overlay to be consistent with the Waterfront Master Plan.⁵ The Planned Development Overlay District allows for greater design flexibility and creative development subject to certain required findings including that the proposed development is consistent with all LUP policies, and the proposed development is demonstratively superior in terms of community design, resource protection and/or public benefit. Specifically, the Planned Development Overlay requires an evaluation of the impact to coastal resources and any such impacted coastal resources must be restored or enhanced beyond what the LCP would otherwise require. The seventh and final overlay is described in greater detail below.

Coastal Resource Protection Overlay

The Coastal Resource Protection (CRP) Overlay is applied to all parcels in the City located in the coastal zone, which is almost its entirety. This overlay serves to implement the LUP's core coastal resource protection policies governing issues such as environmentally sensitive habitat areas (ESHA), visual resources, agricultural protection, lower-cost visitor-serving accommodations, coastal hazards, and coastal access. In other words, while the previously described zoning districts and overlays specify the allowable land uses and general site planning standards for particular land uses in each zoning district, the CRP overlay is meant to implement the LUP's specific coastal resource protection provisions above and beyond the baseline zoning requirements.

In general, these provisions mirror the LUP's policy directives and implement the mechanics of how to meet such requirements, including through required studies and application requirements. For example, with respect to ESHA, the LUP only allows uses dependent on ESHA resources to be located within such habitat areas and requires 100-foot buffers around them. The proposed IP carries forward and indeed refers back to such LUP requirements and lists out the procedures for how to effectively carry them out. IP Section 17.14.080(C) requires all applicants to perform an Initial Site Resource Survey for all CDP applications, and if the survey indicates the presence or potential for sensitive habitats, then the applicant must prepare a Biological Site Assessment. IP Section 17.14.080(D) specifies the contents of such assessment, including to identify and confirm the extent of the ESHA, its sensitivity to disturbance, specific buffer widths, and restoration requirements.

For agricultural lands, the proposed IP mirrors the LUP's agricultural preservation policies to protect the City's agricultural economy. This includes the requirement to maintain the maximum amount of prime agricultural land in the City, prohibiting certain types of commercial uses on such lands, and restricting nonagricultural use of prime agricultural land unless findings are made that there are no alternative building sites, the minimum amount of land is converted for those conditionally permitted uses, and that such uses will not conflict with surrounding agricultural land and uses. The IP similarly

⁵ The Waterfront Master Plan is a certified component of the City's LCP and includes design guidelines for four waterfront planning areas in the City. The City is pursuing additional grant funding from the Commission to update this master plan.

protects non-prime agricultural lands by limiting conversions of such lands. See IP Section 17.14.060 for such standards.

With respect to cultural resources, proposed IP Section 17.14.070 implements the LUP's policies that govern cultural resource protection, including through requisite studies that document the precise location of such resources so as to avoid any adverse impacts to cultural, archaeological, and paleontological resources. The IP also requires consultation with Native American tribes with cultural affiliation to a project site during a preliminary site review and development of a mitigation plan during construction if any archaeological resources are found.

The proposed IP prescribes requirements for lower-cost visitor-serving accommodations in the coastal zone to maintain consistency with policies in the LUP and the Coastal Act. The proposed IP requires all projects involving overnight visitor accommodations to provide at least one new lower-cost accommodation for every four new high-cost accommodations.⁶ Additionally, any proposed removal of existing lower-cost accommodations must also be replaced at a one-to-one ratio. The IP also allows for reductions in the number of required lower-cost accommodations provided certain findings are made, including that the proposed project provides additional amenities such as suite and kitchen facilities that can be understood as a lower- or moderate-cost option for families notwithstanding the specific identified price. The City can also grant a reduction in the number of required lower cost units when considering other factors such as distance from the shoreline, or if the total amount of lower-cost visitor serving accommodations in the City is greater than 50% of all available accommodations, which is the City's goal to maintain as a floor. However, these reduction requests will not apply on State tidelands, which includes much of the waterfront's Embarcadero corridor, nor do they apply for projects that will replace existing lower-cost accommodations. And while the proposed IP prioritizes any lower-cost units to be provided on site as part of the proposed project, it does allow for lower-cost accommodations to be provided off-site or through in-lieu fees equivalent to the cost of providing the required number of lower-cost accommodations. All of these provisions serve to carry out the LUP's policy construct on these points. See IP Section 17.14.040(C).

With respect to coastal hazards, the LUP is quite detailed, and includes a series of strong protections to ensure that new development is located safe and away from coastal hazards risk in a manner that doesn't require shoreline armoring. The proposed IP (see Section 17.14.100) requires all development to conform with these LUP hazards policies while providing specific guidelines for development that may be impacted by coastal hazards. Similar to the manner in which biological resources are protected, the proposed IP requires the preparation of an Initial Site Assessment for all CDP applications to ascertain the potential for hazards risk. Where this initial report reveals

⁶ IP Section 17.14.040(C)(2) defines the lower-cost accommodations rate as the average daily room rate of all economy hotel rooms in the City based on the best available information, not to exceed 75% of the prior year's statewide average daily rate. The higher-cost accommodations rate is defined as the average of all upscale hotel and motel rooms in the City based on the best available information, and must be greater than or equal to 125% of the prior year's statewide average daily rate. Moderate cost accommodations are those with daily room rates in between.

the proposed project is located within a mapped coastal hazard area, the Sea Level Rise overlay, or located within 100 feet of an area potentially subject to geologic or other hazards over a 100-year assessment time frame, then a full Hazards Report is required. The Report shall evaluate the potential impacts of erosion, flooding, inundation, storm waves, and all as exacerbated by sea level rise over the life of the development. The Report shall also include an analysis of measures to avoid identified erosion or site stability hazards, including non-armoring alternatives such as relocation or removal of threatened development. Additionally, the proposed IP requires the recording of a deed restriction for all potentially hazardous locations acknowledging coastal hazards risk, that the development may be subject to coastal hazards during its lifetime, and to waive any future right to construct shoreline armoring devices for all coastal blufftop or shoreline lots.

The proposed IP includes a series of provisions addressing other LUP coastal resource issues, including IP Section 17.14.110's standards for public coastal access. The proposed IP requires public access to be provided from the nearest public roadway to the shoreline and requires an offer to dedicate an easement or a grant of easement for lateral and vertical accessways when prescribed by the LUP.^{7,8} The proposed IP also includes policies requiring conformance with all applicable LUP visual resources and viewshed policies. The IP sets standards for projects located within scenic areas⁹ including the requirement to provide site-specific visual analysis of a project's impact on public views and for all development, including ancillary structures such as fencing and hedges, to avoid impacts to public views, and specifically blue water views. Additionally, the proposed IP requires public utilities to be placed underground, outside of public view, or appropriately screened when feasible and for telecommunication facilities to be sited and designed to avoid adverse impacts to coastal views unless inconsistent with federal telecommunications law.

Lastly, the CRP overlay also includes standards to provide for infill housing, including affordable housing, in ways that do not lead to coastal resource impacts. Specifically, IP Section 17.14.040(B) specifies the protocols to provide for density bonuses and ADUs/SB 9 lot splits, including encouraging such housing types while also ensuring that, for example, they are located outside of sensitive habitat areas or coastal hazard areas. In addition, while parking is not required for most ADUs or SB 9 projects, one parking space per unit is required for such development within the area mapped in Figure 17.14.040(B)(2). This area was identified by the City as being located close to the shoreline and where on-street parking is used for public coastal access purposes. Thus, the one-space per unit requirement is meant to prevent such spaces from competition for use as private residential parking. And for density bonuses, the IP provides for deviation from specific LCP provisions provided an analysis is prepared

⁷ The LUP includes a series of specific access requirements around structures on the water side of the Embarcadero, including a 10-foot-wide 'Harborwalk' for public coastal access, consistent with the Commission's requirements in CDP actions over the years.

⁸ Except where requiring or providing such access would be inconsistent with federal or state law.

⁹ The City identifies scenic areas in Figures C-6 and C-7 of the LUP.

that compares the density bonus project with one without such deviations, and when findings are made that the project encourages housing opportunities for persons of low and moderate income with the least amount of Coastal Act and LCP deviation, and when there will be no significant adverse coastal resource impact due to the approved project.

In addition, to facilitate such housing and mixed-use, infill development opportunities, the IP includes a series of complementary multimodal transportation provisions. Chapter 17.27 specifies parking standards, and this section includes a suite of provisions to be flexible with such requirements, including reducing the amount of otherwise required parking (e.g., when findings are made that there is adequate supply already, when transportation demand management measures are employed, when there are opportunities for shared parking, when located near public transportation stops,¹⁰ etc.), and, for otherwise required spaces, allowing them to be provided off-site or via in-lieu fee. The IP also encourages bike lanes, sidewalks, and trails to promote active transportation, as well as bicycle parking.

Other

Various other site regulations are included in the proposed IP to set guidelines for development when coastal resources may be impacted. These sections include specific provisions for accessory structures, development on substandard lots, allowed/prohibited encroachments into required setbacks, heights and height exceptions, open space protections, and development on sloping lots. Finally, the proposed IP includes a chapter governing interpretation of rules of measurement for aspects of development such as height and setbacks. The IP also includes chapters regarding non-conforming uses, reasonable accommodations, variances, and modifications. The IP also includes a section which addresses the processing and implementing of coastal development permits (CDP). This chapter differentiates the types of CDPs, hearing and noticing requirements, appropriate review/appeal bodies (including the Planning Commission, City Council and Coastal Commission), and opportunities for streamlining via CDP waivers for projects that are consistent with the LCP and do not raise coastal resource issues. These provisions are largely carried over from the existing certified IP and mirror the statutory requirements of the Coastal Act and its implementing regulations in Title 14 of the California Code of Regulations.

See **Exhibit 2** for the full text of the proposed IP and **Exhibit 3** for the proposed zoning map.

B. Evaluation of Proposed LCP Amendment

Standard of Review

The proposed amendment affects the LCP's LUP and IP. The standard of review for the LUP changes is that they must conform with the requirements of Chapter 3 of the

¹⁰ Including in accordance with AB 2097. AB 2097 (Friedman, Ch. 459, Stats. 2022) prohibits public agencies from imposing or enforcing minimum automobile parking requirements on most development projects located within one-half mile of a major transit stop.

Coastal Act; the standard of review for the IP changes is that they must conform with and be adequate to carry out the policies of the certified LUP.

1. Proposed Land Use Plan Amendment

Applicable Coastal Act Policies

As discussed in the description of the proposed LCP amendment, the amendment proposes land use designation changes for three parcels in the City's coastal zone. For all three cases, the proposed amendment is to correct an error on the 2021 adopted LUP land use map for the subject parcels. Coastal Act Section 30250(a) requires residential, commercial, and industrial development to be located in already developed areas able to accommodate such uses without coastal resource impact. Coastal Act Section 30221 gives priority to recreational uses on oceanfront parcels. Specifically, these Coastal Act sections state:

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....*

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.*

Consistency Analysis

The Coastal Act establishes clear parameters and priorities for the location, intensity, type, and design of new development in the coastal zone as a means of protecting coastal zone resources and enhancing them where feasible. These parameters and priorities emanate from both specific Coastal Act policies and requirements, as well as the overlap and interplay between them. As previously stated, the proposed LUP map amendment corrects an error on the land use map which was adopted during the certification of the LUP in 2021. The proposed land use designation changes consist of three parcels, two of which (APNs 065-022-009 and 065-022-011) are located along Highway 1 in the northernmost end of the City. The land use designation for these two parcels was inadvertently changed from Open Space to Agriculture during the certification of the LUP in 2021. Thus, the proposed amendment would correct this error and change the land use designation for these parcels back to Open Space. The oceanfront parcels primarily contain sand and dune habitat with a small informal parking area located along the shoulder of Highway 1 and is the southern stretch of the popular and publicly accessible Morro Bay Dog Beach. Coastal Act Section 30221 speaks to preserving oceanfront land for recreational purposes; thus, the proposed land use map amendment is consistent with Section 30221 and is broadly consistent with the Coastal Act's public access policies as well.

The other proposed land use map amendment will affect one parcel (APN 068-183-026) located on Preston Lane on the eastern side of Highway 1. This proposed amendment will change the land use designation for this parcel from Moderate Density Residential to General Light Industrial. Although one parcel immediately east of the subject parcel is designated Moderate Density Residential, the subject site is developed with a junk yard, and other adjacent parcels are similarly developed and designated for industrial uses. As such, the designation change would better reflect on-the-ground land use conditions and can be found appropriate in this case, consistent with Coastal Act Section 30250(a).

In sum, the proposed LUP land use designation changes are not expected to adversely impact coastal resources and can be found consistent with the Coastal Act.

2. Proposed Implementation Plan Amendment

a. Zoning Designations

Applicable Land Use Plan Policies

The LUP establishes 17 primary land use designations and 2 overlay designations that govern land uses within the City. These designations apply density and intensity requirements, use characteristics, development standards, and land use policies to each parcel. The LUP also includes a land use map to assign land use designations to each parcel in the City and to provide for appropriately located land uses throughout the planning area. The land use map also delineates areas of sensitive coastal resources such as public coastal accessways, scenic resources, and sensitive biological resources. The following LUP Policies provide an overview of the land use policies that seek to provide the framework for property owners, decision-makers, and the public regarding coastal land uses and development in the City:

LU-1.1: Land Use Pattern. *Maintain the current pattern of Morro Bay's land use to preserve the distinct character areas and community form, while enhancing and transforming areas with greatest potential for change to improve economic activity and align them with the community vision.... New development shall be located within, contiguous with, or in close proximity to existing developed areas with adequate public services and where it will not have significant effects, either individually or cumulatively, on coastal resources.*

LU-1.2: Realistic Development Capacity. *Protection of sensitive habitats, natural landforms, scenic resources, and other coastal resources shall be a priority in all City actions and decisions, and all development standards (including with respect to height, setback, density, lot coverage, etc.) shall be interpreted as maximums (or minimums) that shall be reduced (or increased) to protect and enhance such resources and meet LCP objectives to the maximum extent feasible. Development shall only be authorized when the proposed use is allowed per the applicable land use designation, and when it meets all applicable LCP policies and standards.*

LU-4.6: Development Priority. *Using private lands suitable for visitor-serving commercial recreational facilities shall have priority over using such lands for private*

residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

Consistency Analysis

The IP includes numerous detailed provisions that implement the LUP's broad policy goals to ensure the maximum protection of coastal resources. The proposed IP implements the LUP's seventeen primary land use designations through eighteen zoning districts: four residential zones, five commercial and mixed-use zones, two industrial zones, three public and semi-public zones, three waterfront and harbor zones, and one agricultural zone. These zoning districts correspond to each land use designation, and generally mirror each other (e.g., the Low Density Residential designation is implemented by the Residential Low Density zoning district, and the Visitor Serving Commercial designation is implemented with the Visitor Serving Commercial zoning district). The zoning districts provide specific details on the types of uses allowed in each zone as well as the site planning standards such as setbacks, maximum lot coverage, and maximum building height. All uses are required to meet applicable LCP standards, including those for the zoning district (e.g., height, setback, density), those for the specific land use (e.g., design and location standards), and those that apply throughout the coastal zone (e.g., ESHA, wetland, flood hazard, and public view requirements). Therefore, the zoning districts set forth a framework that mirrors the land use designations and implements the policies in the LUP.

At a broad level, the LUP's goal is to reflect existing development patterns in the City by prioritizing infill development within the existing urban fabric, maintain its small beach-town character, and promote economic, environmental, and social resiliency in the face of climate change. The land use regulations and development standards for each district implement these City goals by encouraging denser, infill development in existing areas of the City while protecting open space, parks, and agricultural lands. These goals are further facilitated by ensuring that each region of the City is assigned the best land use accompanied by the most appropriate allowable uses to ensure concentration of development in appropriate locations, and protection of the City's most valuable resources. Additionally, considering most of the developable planning area in the City is already developed, the zoning designations generally correspond to the pattern of existing uses in the City.

The proposed IP provides the specific guidelines and actionable implementation of the broader LUP policies and the goals the City set through this LCP update process. LUP Policies LU-1.1, LU-1.2 and LU-4.6 speak to preserving the distinct character of the City, protecting sensitive resources and habitats by interpreting development standards as maximums or minimums to protect and enhance resources, and prioritizing the use of private lands suitable for visitor serving commercial and recreational facilities, respectively. Thus, the development standards for each zoning district implement these LUP policies by encouraging denser, infill development in existing areas of the City while protecting open space, visitor serving facilities, and agricultural lands. Again, the zoning districts mirror the corresponding land use designation, and thus implement and carry out those basic LUP directives.

Additionally, the IP's encouragement of various types of housing, including affordable housing, ADUs, two-home development, and multi-family units furthers the City's goal of promoting infill development while protecting and preserving coastal areas, as portrayed in LUP Policy 1.1. Consistent with the LUP, the IP ensures that such housing is carried out in a manner protective of coastal resources, including away from eroding bluffs and sensitive habitats. Additionally, the IP includes procedures to implement density bonuses for affordable housing so as to harmonize the State's density bonus law with the Coastal Act/LUP. The IP requires an application that seeks a density bonus in exchange for affordable housing to compare the LCP-consistent project to a project in which the size, scale, density, and other bonuses have been applied, with the goal of allowing the public and decisionmakers a clear understanding of any coastal resource and affordable housing costs and benefits. Thus, the proposed IP's implementation of density bonus law is consistent with Policies LU-1.1 and LU-1.2.¹¹

The Mixed Use Residential (MUR) overlay also furthers the City's goal of providing appropriately located, denser, infill development, and specifically infill housing while preventing urban sprawl into outer limits of the City where valuable open space and agricultural resources are located. The MUR overlay is located primarily in the downtown corridor of the City, spanning the visitor-serving commercial parcels along Market Street and Morro Avenue and between Beach Street and Marina Street. The allowance for residential development in the MUR overlay utilizes locations where visitor-serving commercial uses are currently located but where there is potential for infill residential development either above or behind existing commercial uses. Thus, this overlay implements LUP Policy LU-1.1 by providing for appropriately located infill development and preventing urban sprawl to City's edges. The MUR overlay also provides an opportunity for increased housing stock, which is consistent with the broader statewide goal to increase both market rate and affordable housing.

As previously stated, a vast majority of the City is currently developed and there is little opportunity for expansion outside the current developed areas. However, there are a few sites in the City ripe for redevelopment, including the site of the former wastewater treatment plant and the decommissioned Vistra Power Plant. The 2021 certified LUP designated the Vistra-owned site as Visitor Serving Commercial and Residential while the former wastewater treatment plant is designated Open Space/Recreation. The proposed IP will zone the Vistra site Public Facility and Visitor Serving Commercial with a portion of the site also having the MUR overlay while the wastewater treatment plant site will be zoned Open Space. Thus, the proposed IP provides the corresponding zoning designation to the land use designations currently assigned at these sites with the goal of new and appropriately located land uses in line with the City's goals. However, it should also be noted that these zoning districts are largely advisory at this time, as the LUP requires the preparation of a Master Plan which must be incorporated into the LCP via an LCP amendment prior to any development at either of these sites. This will allow the City to elicit community input and to identify the appropriate kinds and intensities of use based on an analysis of the present coastal resource constraints. In

¹¹ The City's proposed density bonus provisions are similar to other such provisions certified in recent LCPs, including in Santa Cruz County in LCP-3-SCO-23-0004-1-Part B.

short, although the proposed zoning for these two sites is consistent with the current land use designation, the vision for these two sites requires a much larger planning scope to ensure the parcels best serve the needs of the City's residents and visitors, and thus the zoning at these two sites is consistent with the LUP at large.

As a whole, the proposed zoning designations, including the zoning map, and the regulations associated with those zoning districts, including the allowable uses, and associated development standards provide the guidelines for economic and social growth in the City while protecting the City's unique and sensitive coastal resources. The zoning designations appropriately locate residential, commercial, industrial, and public facilities in locations of the City where those uses already exist while ensuring protection of open space and agricultural lands.

In sum, the zoning designations and their associated development standards can be found consistent with and adequate to carry out the policies of the certified Land Use Plan.

3. Resource Protection Standards

Applicable Land Use Plan Policies

The LUP includes policies intended to protect sensitive habitats including ESHA, wetlands, creeks, dunes, and open space; policies that address coastal hazards and flood risk; and policies that protect public views and access, among others:

LU-6.1: Lower-Cost Visitor Serving Facilities. *Lower cost visitor-serving facilities, including overnight accommodations and public recreational opportunities, shall be provided and encouraged. Existing lower-cost accommodations shall be protected and maintained. Overnight accommodations are reserved for transient uses only (30 days or less).*

LU-7.1: Lateral Access. *All existing publicly used lateral accessways and areas shall be protected, preserved, and enhanced to the maximum possible extent, and new lateral accessways/areas shall be encouraged and provided, where appropriate. All lateral connections along the coast, with particular emphasis on the Embarcadero, shall be required to be improved and enhanced. All such connections shall be universally accessible. For new development (defined by the Coastal Act) adjacent to the bayfront or ocean, open and unobstructed public access shall be provided from the nearest public roadway to the shoreline and along the coast as required herein.*

LU-4.5: Recreational Uses. *Oceanfront lands designated for Open Space/Recreation shall be protected for public recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated in those designated areas is already adequately provided for in the area.*

LU-8.7: Embarcadero/Harbor Coastal Hazards Standards. *In the Embarcadero area (i.e. the shoreline between Coleman Park and Tidelands Park) and for harbors/marinas development shall include all feasible measures to avoid, or if avoidance is infeasible, to mitigate against coastal hazard threats and potential impacts to coastal resources. Fill and placement of materials in coastal waters, including shoreline protective devices in this area, shall be the minimum amount necessary, shall be allowable only where there is no feasible less environmentally damaging alternative and where feasible mitigation measures have been provided to minimize adverse environmental effects...*

CD-1.6: Protect Agriculture. *Protect the existing agricultural and open space greenbelt surrounding existing developed areas for its agricultural, open space, habitat, and scenic qualities, including to ensure development remains within existing developed areas with adequate public services. When approving development in areas near agricultural zones in the Planning Area, consider potential long-term agricultural impacts and require mitigation as part of development.*

CIR-4.5: Coastal Access Parking. *Monitor coastal access parking demand and adjust parking strategies to ensure an appropriate amount of parking is provided so as to maximize public coastal access opportunities.*

C-1.1: Environmentally Sensitive Habitat Areas. *Protect Environmentally Sensitive Habitat Areas, or “ESHAs,” defined as any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem, and which could be easily disturbed or degraded by human activities and developments...*

C-1.2: Development in ESHA. *Development in ESHA shall be limited to uses dependent on the resource (e.g., habitat restoration, scientific research, and low-intensity public access and recreation)... All allowable development in ESHA shall be sited and designed to protect against significant disruption of habitat values, including to rare and endangered species....*

C-9.2: Public View Protection. *Public views to and along the ocean and scenic coastal areas shall be protected and enhanced, and alteration of natural landforms shall be minimized. Additionally, development in visually prominent settings, including all development seen from Highway 1, shall be sited and designed to avoid blocking or having a significant adverse impact on public views. Methods to achieve this may include building and road siting, building size, design and lighting that is integrated with the environment, and clustering of development.*

C-2.3: Protection of Cultural Resources. *Ensure the protection of historic, cultural, and archaeological resources during development, construction, and other similar activities. Development shall avoid, to the maximum extent feasible, adversely impacting historic, cultural, and/or archaeological resources, and shall include*

adequate BMPs to address any such resources that may be identified during construction....

OS-1.4: Protection from Development. *Ensure that no development or project impedes public access to any park, open space, or beach. Protect, restore, and enhance all existing parks, beaches, open spaces, and trails. Prohibit new non-public recreational access structures on publicly used beaches.*

OS-4.6: Marine Resources. *Marine resources shall be maintained, enhanced, and, where feasible, restored. Special protection shall be given to species and areas of special biological significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and maintain healthy populations of all species of marine organisms, adequate for long-term commercial, recreational, scientific, and educational purposes.*

PS-3.5: Avoid Coastal Hazards. *Development shall be sited and designed to avoid impacts from coastal hazards over the life of the development. New development, including redevelopment, shall be prohibited from using or requiring shoreline protective devices at any point during the development's life. As a condition of approval for any such development/redevelopment, any existing shoreline protective devices shall be removed and the underlying area restored.*

Taken together, these LUP policies summarize the City's primary goals of this LCP update which include prioritizing infill development within the existing urban fabric of the City, maintaining its small beach-town character, and promoting economic, environmental, and social resiliency in the face of climate change. The LUP policies work together to limit development at the periphery of the City's urban areas and includes policies to better protect, manage and restore ESHA, streams, riparian habitats, and wetlands. The policies also illustrate the City's commitment to maintaining and increasing public access to the coast with lower-cost visitor-serving accommodations policies and provisions requiring lateral access to the coast and the encouragement of recreational opportunities in the City.

Consistency Analysis

As mentioned before, the LUP includes a specific and directive set of policies aimed at protecting sensitive coastal resources, including in terms of public coastal access, coastal hazards, sensitive habitats, and public views. These policies provide the ultimate performance standard (e.g., ensure new development does not include any form of armoring, prohibit residential development within wetlands and ESHA, protect public blue water coastal views, etc.) and the proposed IP carries these provisions out through measures such as required studies, technical reports, and other implementation techniques. In other words, the proposed IP doesn't introduce new policy concepts from what the LUP already requires, but rather reinforces such provisions. The IP includes numerous detailed provisions that implement the LUP's broad policy goals and ensure the protection of coastal resources. The Coastal Resource Protection Overlay serves as the main implementation mechanism to align with the standards set forth in the LUP. At a broad level, the Coastal Resource Protection Overlay sets standards for development

that may impact coastal resources and ensures impacts to resources are avoided, minimized, or mitigated as appropriate in conformance with the LUP. In short, the LUP and IP work together to carry out coastal resource protection requirements.

For example, the LUP includes strong policies pertaining to ESHA, such as LUP Policy C-1.1 which defines ESHA and Policy C-1.2 which requires uses in ESHA to be dependent on the resource and for any development to limit habitat disruption. The proposed IP then carries out these directives by including specific requirements for an initial site assessment, biological studies, and required findings based on evidence that identify appropriate avoidance, mitigation, and monitoring programs. Thus, these standards ensure any development does not exceed the broader threshold of habitat disturbance established by the LUP.

Similarly, with respect to coastal hazards, the LUP requires development to be safe from coastal hazards risk, only allows for armoring to protect existing structures¹² in danger from erosion, requires a series of coastal resource mitigation requirements for allowed armoring, and requires armoring to be removed should a structure be redeveloped. The proposed IP maintains and carries forward all such LUP provisions by including specific details regarding technical studies, alternatives, and mitigation protocols. The proposed IP dictates the contents necessary for inclusion in a coastal hazards report for sites determined by the initial site assessment to be located in potential coastal hazards areas, including as the LCP maps such areas. This report requires the evaluation of the potential impacts of erosion, flooding, tidal scour, and the sea level rise over the life of the development. The requirements to analyze new developments under these standards implements LUP Policy PS-3.5 to avoid coastal hazards, and the City's larger goal to prepare for the effects of sea level rise and coastal hazards both in the near term and in the future.

In regard to public access and recreation, one of the City's primary goals is to ensure "The public has access to plentiful and well-maintained parks, beaches, and recreational activities throughout Morro Bay" (LUP Goal OS-1). The LUP includes strong policies governing the planning of public recreational accessways, especially considering the valuable tourism opportunities and the unique cultural values provided by the working waterfront and the abundant coastal-dependent development available in the City. Thus, the proposed IP implements these goals with standards that require new development to provide public access from the nearest public roadway to the coast in which such public coastal accessways are required to guarantee indefinite access with the requirement for a deed restriction or dedications of right-of-way or easement for all new accessways. These standards are largely already emanated throughout the City, specifically with the existing Harborwalk path that runs parallel to the bay along the Embarcadero, with the exception of a few incomplete stretches where current and planned future projects will provide for continuous Harborwalk connections. Thus, these standards are consistent with Policy LU-7.1 and are broadly consistent with the goal of

¹² Defined in the LUP as those structures in existence when the Coastal Act first came into effect on January 1, 1977 and not redeveloped since.

the LUP to not only provide access to and along the coast, but to maximize public access within the City.

Additionally, regarding lower-cost accommodations, the proposed IP carries out the LUP with additional details regarding what constitutes lower, moderate, and higher-cost units, specifying that new accommodations must include a lower-cost component (typically in an amount equal to 25% of the number of higher-cost rooms), and specifies the protocols for economic feasibility reports and other tools to guide implementation. It should be noted that, compared to most coastal cities in the State, the City has a unique portfolio of overnight accommodations where currently more than half of the City's overnight accommodations qualify as lower-cost.¹³ Thus, the City's inventory of lower-cost accommodations exceeds the statewide goal of ensuring that 25% of the coastal zone's total accommodations inventory is lower-cost. Thus, considering this unique situation in the City, the proposed IP's allowance, through specific feasibility studies and the requirement that any reduction in the otherwise required number of lower-cost units includes mitigation in the form of other visitor serving amenities such as public bathrooms, viewing decks, and public accessways, is appropriate in this case. Thus, not only are the proposed IP's lower-cost accommodations policies consistent with LUP Policy LU-6.1, but they strive to achieve a balance of overnight accommodations in the City, including amenities for visitors not staying overnight.

And finally, the proposed IP provides for a balance in parking standards by ensuring access to the coast is not inhibited by a lack of public parking, but by equally ensuring that the City facilitates growth in terms of infill residential development and smart parking allocations in the Embarcadero and downtown areas. The proposed IP's allowance for a reduction in parking standards along the Embarcadero will ensure that parking is provided for in the City's most popular tourist destination but acknowledges that parking requirements can be met with shared parking between neighboring uses, available public transit, or with the existing supply of on-street parking in the area. The requirement for applicants to provide a parking demand study when seeking parking reductions will ensure that reductions in parking do not negatively impact public access to the coast and thus is consistent with Policy CIR 4.5. Additionally, any project that seeks to reduce parking in accordance with AB 2097 will be required to ensure there are no adverse impacts to public coastal resources in order to protect public access to the coast. However, AB 2097 only applies to development located within half a mile of a qualifying public transit stop¹⁴, which the City currently does not have. Regardless, inclusion of this language ensures the proposed IP will remain consistent with the LCP in situations where the definition of a major transit stop is expanded or in situations where a major transit stop is built in the City.

¹³ The City's 2017 Low-Cost Visitor-Serving Accommodations Technical Memorandum found that 56% of rooms in the City qualify as low cost.

¹⁴ Gov. Code § 65863.2(a), (e)(5)) defines a "major transit stop" as a site containing: (1) an existing rail or bus rapid transit station; (2) a ferry terminal served by either a bus or rail transit service; (3) the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods; or (4) a major transit stop identified in the applicable regional transportation plan.

In sum, the proposed IP implements the LUP's strong resource protection standards by requiring development to meet all applicable such requirements and by facilitating the studies, site evaluations, modifications, and mitigation thresholds necessary to ensure development does not adversely impact coastal resources. Thus, the proposed IP is consistent with and adequate to carry out the LUP, as submitted.

C. 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 prepared an EIR (State Clearinghouse #2021111026) which was adopted by the City Council on May 25, 2021 and determined that no further review is necessary pursuant to CEQA State Guidelines Section 15162.

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, has addressed all comments received, and has concluded that approval of the proposed LCP amendment is not expected to result in any significant environmental effects, including as those terms are understood in CEQA.

Accordingly, it is unnecessary for the Commission to suggest modifications (including through alternatives and/or mitigation measures) as there are no significant adverse environmental effects that approval of the proposed amendment would necessitate. Thus, the proposed amendment 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).