

CALIFORNIA COASTAL COMMISSION

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



August 2, 2017

Mayor Kampe and Honorable Councilmembers
City of Pacific Grove City Council
300 Forest Ave.
Pacific Grove, CA 93950

Subject: Agenda Item 8.A. Local Coastal Program (LCP) Update

Dear Honorable Mayor Kampe and Members of the Pacific Grove City Council:

Thank you for the opportunity to provide comments on the Local Coastal Program Update. As noted in the City's Staff Report, our office has provided substantial comments and edits with regard to the City's draft Implementation Plan (IP). We believe that the suggested edits and format reflect the intended purpose of the IP, which is to carry out the coastal resource protection standards and policies outlined in the Land Use Plan rather than introduce new or additional standards. To that end, the edits to the IP are designed to provide the permit procedures and application requirements necessary to ensure that proposed development projects conform with LUP policies and requirements. We have worked closely with City staff and believe we are in agreement that the suggested edits provide a clear and concise document that will ensure effective and efficient issuance of coastal permits. We will continue to work with City staff in the coming months to fine tune the document.

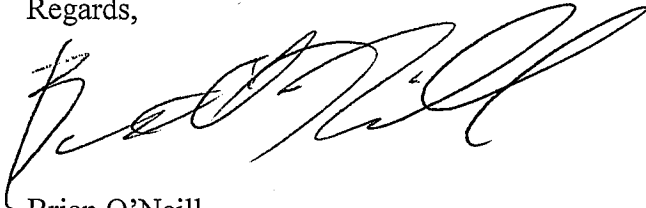
With respect to the potential elimination of zoning districts, we are again in agreement with City staff that removing the zoning districts from the IP is the best alternative in order to develop an IP that conforms with the LUP. The existing 1989 LUP and current draft LUP already contain Land Use Designations that provide for appropriate uses within different areas of the City's Coastal Zone. The various resource protection sections of the LUP (i.e., biological, scenic, water, etc.) provide robust coastal resource protection policies that implement the statewide concerns outlined in the Coastal Act. Both City staff and our office believe that keeping the zoning designations within the LCP unnecessarily complicates the document without providing additional coastal resource benefits.

To be clear, the zoning districts and voter initiative provisions will remain an important part of the City's municipal code and City permit process. However, these would not be utilized as a standard of review for Coastal Development Permits, much the same way Coastal Development Permits are currently reviewed, with the Coastal Act as the standard of review. Inclusion of the zoning districts and voter initiatives in the LCP could needlessly result in the Coastal Commission's involvement on these issues. We therefore support keeping these provisions outside of the LCP context.

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Our office has worked cooperatively with City staff thus far to develop a strong LUP and believe that we are close to the same outcome with the IP. We will continue to offer our time and expertise to make the necessary revisions in an effort to reach our shared goal of a fully certified LCP. We commend City staff and the Pacific Grove community for its extensive work thus far in the LCP update process. We look forward to a continued joint effort to certify the LCP. Thank you for considering our comments.

Regards,

A handwritten signature in black ink, appearing to read "Brian O'Neill", written in a cursive style.

Brian O'Neill
Coastal Planner
Central Coast District Office