March 1, 2017

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

Subject: City Council Agenda Item 4.A Regarding the City of Pacific Grove Local Coastal Program (LCP) Completion Process

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

Thank you for the opportunity to provide comments on the City’s proposed LCP that you will be reviewing this evening. The Pacific Grove LCP, comprised of both a Land Use Plan (LUP) and an Implementation Plan (IP), will be the document that the City and Coastal Commission will use to plan for and regulate development within the City’s coastal zone in order to achieve the objectives of the Coastal Act and the City. Once the LCP is certified by the Coastal Commission, the City will be given the authority to issue coastal development permits for most development, subject to the standards of the certified LCP. The LCP is thus a critical and important document, and we very much appreciate the effort that has gone into crafting it, including the work of your staff with whom we have been collaborating. It is our understanding that City staff is recommending that the City Council adopt both the LUP and IP as approved by the City’s Planning Commission, and authorize City staff to submit the LCP to the Coastal Commission for certification. Please consider the following comments as you make your decision.

With respect to the LUP, Commission and City staff have worked collaboratively and diligently to update the LUP to address current coastal resource and planning issues within Pacific Grove. During this time Commission staff has provided specific comments on the various LUP drafts as they have made their way through the local process. This has allowed a thorough vetting of the issues, including through our active participation at several Planning Commission meetings. While your staff and the Planning Commission embraced many of our suggestions, there remain certain substantive policy differences on key issues, which City staff has identified for you in their staff report for this item (see pages 2-5). We continue to believe that our edits, which have been provided to you, are necessary to ensure the LUP’s consistency with the Coastal Act, and we recommend that you adopt the LUP with those suggestions tonight. We will attend the meeting tonight and will be available to discuss our suggestions, including the underlying reasons for them, should you desire additional explanation.

With respect to the IP, it has not benefitted from the same collaboration and vetting process as the LUP, for a variety of reasons, and additional collaboration is appropriate to further flesh out certain aspects of it to ensure that it can effectively carry out the LUP. We have discussed this issue with City staff, and, if adopted tonight, we have all agreed on a process to ensure that the IP
receives additional attention. We have agreed that if the City Council chooses to adopt the IP at tonight’s meeting, we will continue to work on specific IP language with your staff over the next couple of months to identify and resolve remaining issues, which you would then have an opportunity to review following that effort. At that point, we would then expect to begin the formal LCP amendment process at the Commission level. We believe that this agreed-upon process will allow us to reach a Coastal Commission hearing as quickly as possible and with the least amount of potential issues, and ultimately leading to the best possible LCP to protect Pacific Grove’s considerable coastal resources moving forward. We very much appreciate City staff’s willingness to problem solve in this way, and to work together toward that common goal.

In sum, we very much appreciate the City’s efforts and commitment to the LCP process to date, and we look forward to continued collaboration moving forward to our shared goal of LCP certification for the City. Thank you to your staff and to the Pacific Grove community for all of the hard work and the level of thoughtful engagement in the LCP, and we look forward to a continued joint effort to timely certify it and provide the City a new tool for coastal resource protection and planning moving forward. Thank you for considering our comments.

Regards,

[Signature]

Brian O’Neill
Coastal Planner
Central Coast District Office