

Draft Findings of the Monterey County LCP Periodic Review

CHAPTER 1: Introduction

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CHAPTER 1: Introduction

A. Monterey County Local Coastal Program: Subject of Periodic Review

This is the background report for the Periodic Review of the Monterey County Local Coastal Program. This section of the Introduction describes in brief the context of Monterey County's Local Coastal Program, which is the subject of the Coastal Commission's Periodic Review. The following section of the Introduction describes the purpose of this Periodic Review.

This section first briefly portrays the coastal zone of Monterey County, for which the Local Coastal Program (LCP) governs. Next is a description of the local coastal program components, followed by a brief summary of County permits that have been authorized, changed circumstances, and LCP amendments approved.

1. Monterey County's Coastal Zone

Monterey County covers about 100 miles of the scenic Central California coastline (see Map 1). In the most northerly portion of the County the coastal zone extends inland over much of the Elkhorn Slough watershed. In the central Monterey peninsula area of the County the coastal zone runs along Highway 1 through the Del Monte Forest and northern Carmel area. The southern part of the County includes the Big Sur Coast where the coastal zone reaches up to 5 miles inland generally to the coastal watershed ridgeline of the Santa Lucia Mountains. The *California Coastal Resource Guide* describes the County's resources as follows:¹

Monterey County's north coast is characterized by broad, sandy beaches backed by an extensive dune formation that rims the inner curve of Monterey Bay. The rural area between the Pajaro River and the City of Marina is made up of large tracts of rich agricultural land that stretch inland to the Salinas Valley on a flat coastal plain and along gentle rolling hills. Elkhorn Slough, adjacent to Moss Landing, is an estuarine complex with extensive mudflats and one of the largest salt marshes on the California coast. Sand dunes extend south through the Fort Ord Military reservation and the cities of Sand City, Seaside and Del Rey Oaks to the developed waterfront of the city of Monterey, where the shoreline becomes rocky with sandy pocket beaches. The community of Del Monte Forest and the cities of Monterey, Pacific Grove and Carmel-by-the-Sea are located on the hilly Monterey Peninsula, which supports Monterey pine and Monterey cypress trees

South of the Monterey Peninsula is the Big Sur Coast; noted for its spectacular landscape, the sparsely populated coast has remained relatively undeveloped due to its rugged topography. The Santa Lucia Mountains. The largest of the southern Coast Ranges, rise abruptly from the

¹ California Coastal Commission, *California Coastal Resource Guide*, 1987, University of California Press, pg 201.

ocean to heights of over 5000 feet. Nearly 50 streams flow down the western slopes of the forested mountains through steep canyons to rocky and sandy pocket beaches. The coast redwood reaches the southernmost limit of its natural range just inland from the coast near the southern end of the county. Narrow marine terraces along the Big Sur Coast are used for pasture for cattle grazing.

...There are six underwater reserves and refuges along the Monterey coast...Los Padres National Forest and four state parks encompass a large portion of the Big Sur Coast and inland mountains.

2. Local Coastal Program History and Content

The Coastal Act, which became effective January 1, 1977, requires each coastal jurisdiction to prepare a local coastal program, consisting of a land use plan and an implementation program.² The requirements and guidance, including directions for preparing an Issue Identification and Work Program, were developed soon afterward and the first target deadline for LCP completion was 1981.³ Monterey County had a jump start on the process, as Big Sur was one of the pilot land use plans that had commenced under Proposition 20, the predecessor of the Coastal Act. The County decided to segment its land use plan to cover four separate areas. As a result, The LUP consists of four plan documents: *North County Land Use Plan*, *Del Monte Forest Land Use Plan*, *Carmel Area Land Use Plan*, and *Big Sur Coast Land Use Plan*. The *Big Sur River Protected Waterway Plan* and the *Little Sur River Protected Waterway Plan* are also certified as components of the land use plan for the Big Sur Coast.

Preparation of the background reports to these plans occurred between 1979 and 1982. These were followed by draft land use plans, that were then subject to local public hearings. The plan documents were approved by the County; then eventually, after revisions, by the Coastal Commission. Certification of the four Land Use Plan segments occurred in June 1982 for the North County, April 1983 for the Carmel Area, September 1984 for Del Monte Forest, and April 1986 for the Big Sur Coast.

Preparation of Monterey County's *Coastal Implementation Plan* then followed in the mid-1980's. It is comprised of six parts: Four Parts (II –V) are regulations for development for the four area segments: Chapter 20.144 of the *County Code* for North County; Chapter 20.145 for Big Sur, Chapter 20.146 for Carmel Area, and Chapter 20.147 for Del Monte Forest. Part I of the *Coastal Implementation Plan* consists of Coastal Zone regulations in Title 20 of the *County Code*. The final Part VI of the *Implementation Plan* consists of Other Applicable County Ordinances, the Zoning District Maps, and a series of other Appendices. The terms "Implementation," "County Code," and "zoning" are all used in this Periodic Review report to refer to provisions of the *Coastal Implementation Plan*.

² *Public Resources Code* Sections 30500 and 30108.6. Implementation consists of zoning ordinances and zoning district maps.

³ *California Code of Regulations*, Sections 13550 through 13550, *Coastal Act* Section 30517.5.

The complete *Coastal Implementation Plan* was effectively certified on January 12, 1988. The small areas of Malpasos and Yankee Beaches within the Carmel Area were not certified and remain Areas of Deferred Certification (ADCs). On February 4, 1988, Monterey County assumed authority for issuing most coastal permits in the county. It is worth noting that while final LCP certification occurred in early 1988, some parts of the LCP were developed earlier and based on information that was compiled beginning in the late 1970's.

3. Post-Certification Permits and Appeals

Between LCP certification and November 2002, Monterey County has processed an estimated 2,644-2,731 coastal development permits pursuant to the LCP.⁴ Only certain of these permit decisions are appealable to the Coastal Commission, based on Coastal Act criteria.⁵

The number of appeals to the Coastal Commission of coastal permits approved by the County has generally increased over the last ten years. As of February 2003, there have been 59 appeals from County coastal permit decisions. This number is the second highest number of appeals of all coastal jurisdictions. However, the Commission determined that the appeals raised a Substantial Issue (SI) with regard to conformance with policies of the certified LCP and the access policies of the Coastal Act in only about 20% of those appeals.⁶ Of the appeals determined to raise a substantial issue, public access, protection of scenic and visual resources and landform alteration, and protection of environmentally sensitive habitat areas (ESHA) were the issues raised most often.

⁴ County permit database records estimate 2,731 coastal development permits and Commission records estimate 2,644 post certification permits issued. The discrepancy in totals may be due to some permit notices not reaching the Commission and/or some records in the County system being for permits that ultimately were not finalized (e.g., still pending, withdrawn, given new numbers, determined not to be coastal permits, etc.).

⁵ Coastal Act Section 30603 states, in part:

(a) After certification of its local coastal program, an action taken by a local government on a coastal development permit application may be appealed to the commission for only the following types of developments:

(1) Developments approved by the local government between the sea and the first public road paralleling the sea or within 300 feet of the inland extent of any beach or of the mean high tideline of the sea where there is no beach, whichever is the greater distance.

(2) Developments approved by the local government not included within paragraph (1) that are located on tidelands, submerged lands, public trust lands, within 100 feet of any wetland, estuary, or stream, or within 300 feet of the top of the seaward face of any coastal bluff...

(4) Any development approved by a coastal county that is not designated as the principal permitted use under the zoning ordinance...

(5) Any development which constitutes a major public works project or a major energy facility.

(b) (1) The grounds for an appeal pursuant to subdivision (a) shall be limited to an allegation that the development does not conform to the standards set forth in the certified local coastal program or the public access policies set forth in this division.

(2) The grounds for an appeal of a denial of a permit pursuant to paragraph (5) of subdivision (a) shall be limited to an allegation that the development conforms to the standards set forth in the certified local coastal program and the public access policies set forth in this division.

⁶ Where "no substantial issue" was found, the County coastal permit remains the governing permit.

4. Summary of Changes Since Certification

Since LCP certification in 1988, significant changes have occurred in the County. According to demographic figures developed by the Department of Finance (DOF), Monterey County had an estimated population in 1982 of 306,600 (when the first land use plan was certified).⁷ By July 2001 the population had grown to 407,200, an increase of almost 32% percent.⁸ By 2010 DOF estimates the population will grow to 493,100 and by 2020 to 590,700; a 92% increase from 1982 levels and a 45% increase from 2001 levels.⁹ The Association of Monterey Bay Area Governments (AMBAG) studies offer similar projections. Population estimates for the County as a whole for 2020 are projected at 546,610, an increase from 2000 of 33.8%.¹⁰ While some of the projected population growth is projected to be outside the coastal zone, growth is expected to occur in coastal areas and the overall county growth will nonetheless exert pressures on coastal resources, including groundwater supplies, recreational resources, and water quality.¹¹ This projected population increase, both in and outside of the coastal zone, will continue to place significant pressures on coastal resources along the Monterey coast.

Some land uses have changed in the county. Growth and development of urban and suburban land use has increased, though it remains a relatively small proportion of the total land area. This has occurred mainly in the northern and central portions of the county coastal zone. This type of urban and suburban development has expanded into semi-rural areas, -for example near Elkhorn Slough- largely outside the reach of urban services.¹² The Fort Ord Military Reservation was converted from military to civilian use. While mainly outside the coastal zone, this change to residential, commercial, and other institutional (including California State University at Monterey Bay) use may alter pressures on coastal resources. A substantial section of dunes and shoreline along this portion of the coast is slated to be transferred to State Parks. Additional residential and golf course development took place in Del Monte Forest.

5. Local Coastal Program Amendments

Monterey County's local coastal program has evolved since certification, as over 25 amendment packages, addressing a variety of subjects, have been submitted to the Coastal Commission over the

⁷ State of California, Department of Finance, *Updated Revision of Historical County Population Estimates and Components of Change, July 1, 1970-1989*, September 2002, Sacramento, California.

⁸ State of California, Department of Finance, *County Population Estimates and Components of Change, July 1, 2001-2002, with Historical 2000 and 2001 Estimates*, January 2003, Sacramento, California.

⁹ State of California, Department of Finance, *Interim County Population Projections*, June 2001, Sacramento, California.

¹⁰ Association of Monterey Bay Area Governments (AMBAG) & Association of Bay Area Governments (ABAG), *Monterey Bay Area-Silicon Valley Interregional Partnership Study Phase 2 Report, Analysis of Anticipated Growth in Monterey, San Benito, Santa Cruz and Santa Clara Counties, 2000-2025*, August 2002, pp. III-6-III-7.

¹¹ Association of Monterey Bay Area Governments (AMBAG) & Association of Bay Area Governments (ABAG), *Monterey Bay Area-Silicon Valley Interregional Partnership Study Phase 2 Report, Analysis of Anticipated Growth in Monterey, San Benito, Santa Cruz and Santa Clara Counties, 2000-2025*, August 2002, pg. II-3.

¹² California Coastal Commission, *ReCAP Pilot Project: Findings and Recommendations, Monterey Bay Region*, September 1995, pgs. 7-8.

years. The *Big Sur Coast LUP*, however, has not been amended. Most of the amendments submitted have been certified, as noted below:

Countywide amendments were approved for:

- Wireless Communication facilities, and
- Reorganization of update of coastal zoning regulations.

North County amendments were approved for:

- Various project specific land use and zoning map changes;
- Wastewater discharge regulations;
- Correcting map errors; and
- Adding a new Agricultural Industrial designation.

Del Monte Forest amendments were approved for:

- Project specific land use and zoning changes;
- Revisions to provide updated information on sewer and water availability and changes in priorities for allocation of services; and
- Wastewater discharge regulations.

Carmel Area amendments were approved for:

- Turn lane from Carmel Valley Road to Highway One;
- Reduced height limits in Yankee Point, Carmel Point, and Carmel Meadows areas;
- Various project specific land use and zoning map changes;
- Wastewater discharge regulations; and
- Expansion of visitor facilities at Mission Ranch.

B. Monterey County Periodic Review - Overview

This section of the Introduction sets the context for the Periodic Review report that follows. First is a discussion of the authority to conduct periodic review and the benefits of doing so. Next is a discussion of the periodic review process. A description of the context of this report then follows.

1. Purpose and Authority of Periodic Review

Section 30519.5 of the Coastal Act requires the Commission to conduct a periodic review of a government's local coastal program at least once every five years. The basic purpose of the review is to determine whether the LCP is being effectively implemented in conformity with policies of the Coastal Act. Section 30519.5 states:

(a) The commission shall, from time to time, but at least once every five years after certification, review every certified local coastal program to determine whether such program is being effectively implemented in conformity with the policies of this division. If the commission determines that a certified local coastal program is not being carried out in conformity with any policy of this division it shall submit to the affected local government recommendations of corrective actions that should be taken. Such recommendations may include recommended amendments to the affected local government's local coastal program.

(b) Recommendations submitted pursuant to this section shall be reviewed by the affected local government and, if the recommended action is not taken, the local government shall, within one year of such submission, forward to the commission a report setting forth its reasons for not taking the recommended action. The commission shall review such report and, where appropriate, report to the Legislature and recommend legislative action necessary to assure effective implementation of the relevant policy or policies of this division.

In addition, under provisions of Section 30501 of the Coastal Act, the Commission may recommend specific uses of more than local importance for consideration by any local government for inclusion in its local coastal program. Thus, the Coastal Act requires that the Commission assure that the ongoing implementation of a certified Local Coastal Program is effectively meeting the statewide policy goals of the Coastal Act.

The Commission has lacked sufficient resources to review every LCP at least once every five years pursuant to PRC 30519.5. As a result, the Commission adopted priorities for conducting reviews. In December 1998, the Commission identified Monterey County as one of the five highest priorities for periodic LCP review. In May 2001, the Commission voted to make the County the next in line for Periodic LCP Review following completion of the San Luis Obispo County LCP Review. Commission staff began the review with meetings with County staff in December 2001 and with a public outreach and issue scoping in March 2002.

2. Benefits of Conducting a Periodic Review

In addition to the explicit statutory basis for periodic review, such a review is also a natural step in the ongoing partnership between the Coastal Commission and local governments in coastal resource management. This partnership does not end with the certification of an LCP. Rather, the challenging tasks of implementing, monitoring, enforcing and updating a coastal program only begins at that point. A periodic review of an LCP provides a valuable opportunity to enhance the coastal management program at the local level in a number of ways. It enables the Commission, in cooperation with the local government, local residents and others, to assess the community's progress in carrying out its coastal program. It also provides a chance to update relevant coastal resource information, especially concerning cumulative effects and emerging issues that perhaps were not fully known or appreciated when the LCP was originally prepared. Finally, it provides a means to work with the local government to identify changes that may make the LCP function better, consistent with the requirements of the Coastal Act.

When the Coastal Commission reviews the implementation component of an LCP, or an amendment to it, the standard of review is consistency with the certified land use plan. When the Commission reviews a project on appeal, the standard of review is consistency with the certified LCP and Coastal Act access policies. It is, therefore, very important that a certified LCP is continually reviewed and updated in order for the LCP to continue to function as an effective standard for sound coastal resource management decision-making.

A periodic review reflects experience gained in the implementation of the LCP through planning and regulation at the local level. But it also can reflect the outcome of other implementation actions such as acquisition and operation of beach accessways, restoration of wetlands, execution of habitat conservation or resource management plans, and conduct of educational programs, all of which bring to reality the programs and recommendations of the LCP. Program enhancements recommended through a periodic review can include suggested amendments to land use designations, regulatory policies or procedures, but may also include intergovernmental coordination measures or actions by other state or local agencies to improve LCP implementation.

3. Determination of Issues Covered in This Review

An early step in preparing this Periodic Review was determining what issues to evaluate. The Coastal Act contains several general topics, such as public access, sensitive habitats, and agriculture. From these, issues specific to Monterey County's implementation of its LCP were formulated. Issue scoping was both internal within the Coastal Commission staff and external involving the general public.

For internal issue scoping, the Commission staff receives over 90% of Monterey County's locally issued coastal permits and reviews most of them in varying degrees of detail. Notes are made on issues that arise, both during the County process and on the final permit, even if these issues do not rise to the level of a potential appeal. Summaries of the important and recurrent themes are kept. These summaries were reviewed to help derive the issues that this report addresses.

For external issue scoping, responses came in a range of formats.¹³ Some responses simply suggested topics to examine (e.g., “Monterey pine trees”). Other responses were much more directive (e.g., “make sure no more pine trees are cut”). For purposes of consistency and following the legislative mandate of periodic review, all issues were rewritten to be in a standard format with a Coastal Act basis of evaluation.

4. Presentation of Periodic Review Analysis

One hundred issues were selected for analysis at different levels of complexity. A series of 72 issues, where the analysis was most straightforward, is found in Appendix A. The remaining 28 issues that were evaluated in more depth are presented in the following Chapters 2 -8. Each issue was independently numbered and therefore the numbering in this report is not sequential. Of the 28 issues examined in more depth, County permit review and the resulting analysis was more extensive for 17 issues. These are presented under the following subheadings: Overview, Resource Background, LCP Provisions, LCP Implementation, and Analysis of Coastal Act Conformance. Those remaining 11 issues had many fewer permits associated with them and, thus, their reviews are shorter and more focused on policy analysis. Additionally, eleven procedural issues are outlined in Chapter 10.

Although the issues presented are divided among Coastal Act topics, there is much overlap, because many issues are not single-focus. Some of the major issues especially lend themselves to integrated responses. For example, in North Monterey County agricultural preservation, water use, and water quality are all linked. The first section of the Executive Summary explains these interconnections.

For each of the 17 issues analyzed in the greatest depth, a sampling of county issued coastal permits was reviewed. The sampling was not entirely random, but rather sought to find representative permits that addressed the issue in question, with emphasis on more recent County actions.¹⁴ The sample sizes are small and hence may not be statistically significant. Commission staff relied mainly on the County’s database record of permit actions and the post-certification Final Local Action Notices (FLANs) consisting of permit findings and conditions.¹⁵ Staff recognizes that additional information is contained in County permit files (e.g., in forest management plans, biological reports, and applications) that might not be reflected in this report. Nevertheless, the intent was to help uncover instances of problematic interpretations of LCP policies that need correction.

Individually discussed County coastal permits are cited in footnotes with the County’s permit number, followed in parentheses with the number that the Coastal Commission assigns the permit notice when it is received. In cases where the County coastal permit is appealed to the Coastal

¹³ See California Coastal Commission, “Report on the Monterey County LCP Periodic Review,” February 14, 2002.

¹⁴ The database consulted to select coastal permits included those issued through November 2002. In a few cases, follow-up analysis consulted later permits.

¹⁵ The County is required to file these with the Commission pursuant to *California Code of Regulations* Section 13571.

Commission, the appeal material has also been reviewed, and the Coastal Commission's appeal number is cited in parentheses.

In conducting the review Commission staff also consulted a variety of new and revised environmental studies and other information regarding protection and management of coastal resources, and several area experts. These sources are all footnoted.

As the Commission found in other periodic reviews, performing an LCP evaluation is difficult because of the lack of good, consistent monitoring data. This review reinforces the need to improve coordinated and consistent post-certification monitoring.

5. Results of Monterey County Periodic Review: Recommendations

The results of the Periodic Review analysis are recommendations to the County for corrective actions that should be taken in order to ensure implementation of the LCP in conformity with the policies of the Coastal Act. These recommendations are all listed or referenced at the beginning of this chapter. These recommendations, although extensive, do not mean that the entire LCP lacks conformity with the Coastal Act. On the contrary, in many policy areas the LCP remains effective in carrying out the goals and objectives of the Coastal Act. Major concepts in the LCP, such as Big Sur Coast's critical viewshed policy, remain exemplary today. While the recommended actions focus on suggested improvements, in most cases they reflect changed circumstances, new information, or language ambiguities, and build on the existing policies rather than recommend entirely new directions.

These are preliminary recommendations for review and comment with Commission action tentatively planned for December 2003. Recommendations are divided into two major categories: those that address the County's LCP and those that involve planning, management or other actions to be undertaken by a variety of entities. The recommended LCP changes include policy, procedural, and action items. They can involve either the land use plans or the *Coastal Implementation Plan* or both (as summarized in the table in the Executive Summary). Generally, where a land use plan change is necessary, a corresponding zoning change will be required. In most of these instances the analysis and recommendation focus on the land use plan, with just an indication that a zoning change will also be required. While recommendations suggest specific changes to the currently certified versions of the LCP, some flexibility in final wording, format, and location in the LCP is anticipated, since the County is completely revamping its current Local Coastal Program as part of a new 21st Century Monterey County General Plan and policies now found in separate land use plans may be consolidated or otherwise reformatted.

Regarding the recommendations addressing implementation provisions, the Commission understands that the County will be preparing extensive zoning revisions after completing the 21st Century Monterey County General Plan update. The Commission recognizes that the County may decide to reformat the *Coastal Implementation Plan*. This task is not likely to occur within the

yearlong period that the County is required to consider Periodic Review recommendations. The Commission anticipates working with the County to ensure that Periodic Review recommendations addressing zoning are factored into the work program for *Coastal Implementation Plan* revisions.

Similarly, regarding the recommended actions directed toward the County, the Commission recognizes the limited resources available for planning and management activities. For example, the local assistance planning grant program to support local government coastal management activities was eliminated from the Commission's budget this year. County staff has indicated that given the commitment to complete the 21st Century Monterey County General Plan update and then the zoning update, the need to perform basic infrastructure planning, and the lack of resources available, it is unlikely the County will be able to perform other planning activities any time soon. Nevertheless, as noted in this Periodic Review analysis, such actions are often central to assuring long-term protection, management and restoration of coastal resources as envisioned by the goals of the Coastal Act. This Periodic Review found instances of important actions that the County committed to in the current LCP that have not yet been implemented and recommends additional ones as well. But, given current financial limitations, the Coastal Commission does not expect Monterey County to implement all of the recommended actions within the year specified under Coastal Act Section 30519.5.b. Rather, the Commission expects that such actions will be included in the Implementing Action section of the 21st Century Monterey County General Plan update with an indication of time frame and responsible department(s), in anticipation that additional financial resources may be available in the future.

The Commission also realizes that sound coastal resource management is not only the County's responsibility. This Periodic Review analysis has found many instances where changes to the County's LCP alone are not likely to fully address the concerns raised. Thus, this Periodic Review also includes a series of recommended measures for non-regulatory management, planning, and institutional cooperation, that are appropriate for other entities, private and/or public (instead of, or in addition to, Monterey County) to take in Appendix D. Under Coastal Act Section 30404, the Coastal Commission has the ability to submit recommendations to certain listed state agencies to encourage them to carry out their functions consistent with the Coastal Act.

All recommendations are directed to the coastal zone, based on the Coastal Commission's mandate. If policies covering the topic in question are placed in the 21st Century Monterey County General Plan update element chapters, the County may elect to apply any recommendations to beyond the coastal zone, but the County is not obligated to do so.

6. Relationship With the 21st Century Monterey County General Plan Update

As noted, the County is undertaking a comprehensive update to its General Plan and LCP. The original aim of the Coastal Commission was to perform this Periodic Review concurrently with Monterey County's 21st Century Monterey County General Plan update in order for the Periodic Review recommendations to be used in updating the certified coastal land use plans. Attempting to

coordinate the two efforts has proved challenging. The Coastal Act mandates review of the implementation of the certified local coastal program, yet the 21st Century Monterey County General Plan update is itself resulting in substantial policy revisions. Limited resources and competing priorities precluded the Commission from completing the Periodic Review prior to the County's release of the first draft of the 21st Century Monterey County General Plan update in December 2001. The Commission recognizes that the County has made substantial progress in updating their General Plan/coastal land use plans and as a result may have already developed means to address some of the issues raised in this Periodic Review.

In February 2003, the Commission staff provided the series of preliminary Periodic Review staff recommendations contained in Appendix A to the County. County staff has since been consulting them as they continue work on the 21st Century Monterey County General Plan Update. As recognized by the County and the Commission, the Periodic Review is a unique opportunity to integrate Coastal Act and Monterey County General Plan planning issues and concerns.

It is important to note that these Periodic Review recommendations will not be the Coastal Commission's sole comments on the 21st Century Monterey County General Plan update. The 21st Century Monterey County General Plan update consists of revising LCP policies beyond those examined in this Periodic Review. Ultimately, that portion of the 21st Century Monterey County General Plan update that constitutes the County's revised Local Coastal Program Land Use Plan, will have to be reviewed and approved by the Coastal Commission as an amendment to the currently certified document. Already substantial Coastal Commission staff time has been spent providing comments on draft 21st Century Monterey County General Plan update products and discussing these with County staff. Not all of such comments are reflected in this review document. Staff's intention is to continue this dialogue and commenting as the 21st Century Monterey County General Plan update process proceeds.

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