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January 18, 2022

Katherine Donovan
City of Santa Cruz Planning Department
809 Center Street, Santa Cruz, CA 95060

Re: City of Santa Cruz Local Coastal Program 2021 Amendment

Dear Ms. Donovan,

The Sierra Club welcomes the opportunity to review and comment on the City of Santa Cruz 2021 Amendment to its Local Coastal Program (LCP). However, our ability to give meaningful input is severely compromised by the unavailability of a detailed section-by-section summary of changes made to the current LCP. Such a detailed summary of changes is needed for a document with such substantial reformatting. Nor is there available a redline copy or a track-change copy. Until recently even the current LCP was unavailable on the city's Planning Department website.

Lacking such documents, a side-by-side comparison is not practicable. This is a disservice to the public. We recommend that the process be halted until detailed section-by-section summary of changes made to the current LCP is made available so members of the public can offer meaningful input.

For example, there are significant changes in the Goals in the Introduction. Without a side-by-side comparison, such changes are not self-evident. It is unreasonable to expect the public to do this laborious work over the entire 272-page document.

Here is the Draft. We have underlined the words and phrases that are changes from the current LCP language.

2021 DRAFT

The Coastal Act's basic goals are to:

- (1) Protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources.
- (2) Assure orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs of the people of the state.
- (3) Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners.
- (4) Assure priority for coastal-dependent and coastal-related development over other development on the coast.
- (5) Encourage state and local initiatives and cooperation in preparing procedures to implement coordinated planning and development for mutually beneficial uses, including educational uses, in the coastal zone

Here is the current LCP. We have *italicized* words and phrases that have been removed in the Draft.

CURRENT LCP

The Coastal Act's basic goals for conservation and development in the coastal zone are:

- (1) protect, enhance, and restore the natural resources of the coast;
- (2) protect, enhance and restore the built resources of the coast—*the special communities and neighborhoods that have unique cultural, historic, and aesthetic qualities*;
- (3) give priority to coastal-dependent development—uses of land and water that by their very nature require coastal sites — over other development on the coast;
- (4) maximize access to the coast *for people of all income ranges* consistent with the protection of coastal resources; and
- (5) encourage *orderly, balances [sic] development that avoids wasteful sprawl by concentrating new growth in already developed areas with adequate public services or in other areas near major employment centers consistent with resource protection policies.*

Significant changes include:

- Insertion of the qualifier “where feasible” into the restoration and protection of natural resources
- Removal of the coastal access requirement that it apply to “people of all income ranges”
- Addition of a brand new paragraph that “encourages state and local initiatives...for planning and development...in the coastal zone.”

While such changes may mirror state legislative changes, nowhere is the source of these changes indicated nor what specifically has been changed. Other significant changes in the 272-page draft are likely similarly obscured. What has been removed in the 2021 draft, as well as what has been changed, suggests a shift in interpretation of the Coastal Act. This raises the question of whether such a shift would weaken public access protections and unfavorably affect the conservation of natural resources and if so, how such changes are reflected throughout the draft. Both of these concerns merit a more thorough examination, which is seriously hindered by the lack of access to side-by-side versions of the LCP.

Thus, in the interests of public participation and meaningful input in the democratic process, the Sierra Club calls for a detailed section-by section summary and a restart of the timeline for comments. The comment period should begin when the public has access to a detailed section-by-section summary with actual text, not generalities, of the changes being proposed.

Thank you for your consideration of these comments. Your response is requested.



Michael Guth, Chair
Sierra Club Executive Committee
Santa Cruz County Group