



August 7, 2020
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219
Via Electronic Delivery: ExecutiveStaff@coastal.ca.gov

RE: City of San Clemente Major Amendment No. LCP-5-SCL-18-0099-1 – Major Remodel Definition (Item Th10a)

Honorable Members of the Commission,

The League of California Cities Coastal Cities Group thanks you for the opportunity to comment on your consideration of the City of San Clemente's amended definition of Major Remodel. It is our understanding that San Clemente does not currently have a certified Local Coastal Plan (LCP). While the definition of Major Remodel in this instance may make sense to establish "existing development" as prior to January 1, 1977, our concern is that the continued push to utilize such a date will end up penalizing those cities that have been responsibly developing under certified LCPs.

Over the last two years, a number of communities have heard from California Coastal Commission (Commission) staff that a timeline for "existing development" will only include structures predating the Coastal Act. However, this one size fits all approach does not take into account reasonable and responsible development that occurs under certified LCPs and could unintentionally cause communities currently updating their certified LCPs to simply abandon plans to make much needed updates to these documents out of concern that existing development in their communities will be labeled as nonconforming.

Additionally, the expansion of work this definition will place on Commission staff is concerning. The Commission admits that it is already understaffed, with current staff workloads. Thus, additional work could lead to delays to important projects and regulatory efforts. This places a heavy burden on both local communities who have already been implementing the Coastal Act through their certified LCPs and those who are in need of updates.

The League of California Cities Coastal Cities Group supports the Commission and staff in developing definitions of "existing development" at the municipal scale to reflect reasonable and responsible development implemented under certified LCPs. We request the Commission consider the ramifications of continued attempts to define "existing development" as a blanket definition predating January 1, 1977.

If you have any questions, do not hesitate to contact me at (916) 658-8218.

Sincerely,

A handwritten signature in blue ink that reads "Derek Dolfie".

Derek Dolfie
Legislative Representative