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**[PDF] LCP Local Assistance Grant**

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**From** Graeven, Rainey@Coastal <Rainey.Graeven@coastal.ca.gov>

**Date** Thu 8/28/2025 10:56 AM

**To** Herlihy, Katie (kherlihy@ci.capitola.ca.us) <kherlihy@ci.capitola.ca.us>; PLANNING COMMISSION  
<planningcommission@ci.capitola.ca.us>

**Cc** Kahn, Jessica <jkahn@ci.capitola.ca.us>; Breeze Kinsey <breeze@civicknit.com>

 1 attachment (411 KB)

Local Coastal Program Local Assistance Grant Letter 8.28.25.pdf;

Dear Ms. Herlihy and Planning Commission,

Please find our comments related to the LCP Local Assistance Grant attached. Please feel free to get in touch with any questions.

Thank you,

**Rainey Graeven**

Central Coast District Supervisor  
California Coastal Commission  
725 Front Street, Suite 300  
Santa Cruz, CA 95060

**CALIFORNIA COASTAL COMMISSION**

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**August 28, 2025**

**Sent Electronically**

Katie Herlihy, Community Development Director  
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Capitola Planning Commission  
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**Subject: Local Coastal Program (LCP) Local Assistance Grant Program**

Dear Ms. Herlihy and Planning Commissioners,

We appreciate the opportunity to review and comment on the City's proposed LCP amendments, and we would like to offer the following comments related to broader adaptation planning as well as specific suggestions to the proposed LCP amendment language. As part of its eighth round of rolling LCP grants, the Coastal Commission awarded the City of Capitola \$450,000 to complete necessary technical and environmental studies, engage with the community, regulatory agencies, and key stakeholders, and update its LCP with a particular emphasis on adapting the Cliff Drive corridor. First and foremost, we would like to commend the City for taking this initial step to embark on critical coastal adaptation planning, and we hope the City will continue its efforts and the momentum showcased here to address coastal hazards and complete a comprehensive and city-wide coastal adaptation plan update. In terms of the subject grant, we have worked closely with City staff and its team of consultants over the last few years, reviewing and providing feedback on various grant deliverables to facilitate both the LCP amendment and an actual phased adaptation project along Cliff Drive, and we will continue to work closely with the City on the forthcoming CDP for an adaptation project along Cliff Drive.

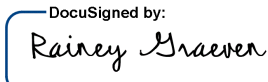
In terms of the proposed LCP amendment, we have reviewed the draft amendment language on the City's website and would like to offer the following recommendations (see attachment with substantive changes to IP Sections 17.68.090 and 17.68.160 and LUP Policy VII-2; existing LCP language is shown in black, the proposed changes posted to the City's website are shown in green strikethrough and underline, and the additional changes requested here are shown in purple strikethrough and underline). We believe the items depicted in purple were inadvertently left out of the version posted to the City's website. Substantively, these changes would: 1) align the LCP with the deriving Coastal Act sections; 2) align the LUP with the IP via ensuring that any changes to the LUP are also reflected in the IP and vice versa; 3) clarify the requisite

## **Local Coastal Program (LCP) Local Assistance Grant Program**

information and analysis required of geologic/engineering reports<sup>1</sup>; and 4) correct minor miscellaneous typos.

We appreciate the Planning Commission's consideration of these suggestions and hope that they are incorporated into the proposed LCP amendment package.

Sincerely,

DocuSigned by:  
  
AFF4284CFEB54FA  
Rainey Graeven

Cc (Sent Electronically):

Breeze Kinsey, CivicKnit  
Jessica Kahn, Public Works Director

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<sup>1</sup> LUP Chapter 5 and the corresponding IP Chapter 17.68 have not been updated since they were originally certified in 1987 and reference manuals and guidance documents that have long since been updated and replaced. The amendment language posted to the City's website proposes to strike the out-of-date language but does not include language to update/replace those out-of-date references. The proposed modifications identified here would thus update the language to identify the information needs/analysis that should be included in any geologic/geotechnical reports.

**17.68.090 Beach area regulations.** In the GH district:

A. A geologic/engineering report shall be required for all developments located on or adjacent to ~~near~~ a beach, including shoreline protective measures. "Shoreline protective measures" includes the installation, in an area where coastal process operate, of any structure or material, including but not limited to riprap or a seawall, for the purpose of protecting any structure, including a road, utility or transmission line. Shoreline protection structures shall be permitted only ~~when they are:~~

1. ~~Necessary~~ If required to protect coastal-dependent uses, and or existing development structures (other than accessory structures), or public beaches in danger from erosion; or and

2. ~~Necessary to protect public beaches in danger from erosion, and o~~ Only if ~~if~~ nonstructural solutions (e.g., i.e., artificial beach nourishment, relocation of structures, etc.) and any other less environmentally damaging alternatives (such as nature-based adaptation measures) have proven to be infeasible; and

3. If they are determined to be the least environmentally damaging feasible alternative to protect the endangered structure/beach/use; and

4. If all coastal resource impacts are avoided, and where all unavoidable impacts are commensurately mitigated; including that they are d~~e~~signed so as to eliminate or mitigate adverse impacts on local shoreline sand supply, public access, marine habitats, visual resources, and paleontological resources, and any other coastal resources; and

~~54-~~ Designed to provide lateral and vertical public access elements where feasible (Ord. 628 §2(part), 1987).

**Commented [RG1]:** IP Section 17.68.090 should be updated in accordance with the deriving Coastal Act Sections (Sections 30235 and 30253) and to mirror the edits that were included for corresponding LUP Policy VII-9.

**17.68.160 Contents of geologic/engineering reports.** All geologic/engineering reports required by this chapter shall be prepared according to the guidelines for practice issued by the California ~~Division of Mines and Geologic Survey~~ and shall be based on the best available, professionally accepted science and scientific guidance to project sea level rise and other climate change related environmental changes, coastal erosion, bluff failure, flooding, and other coastal hazards, specifically, No. 37 Guidelines for Preparing Engineering Geological Reports and Coastal Commission Guidelines for Bluff Top Development. Reports shall consider a range of erosion and sea level amounts based on various time horizons so as to understand the coastal hazards risks and potential adaptation pathways for the proposed development, and all development shall be sited to maintain a minimum factor of safety against land sliding of 1.5 (static) and 1.1 (pseudo static) for a period of 50 years. The required geological reports for all developments shall be prepared by a registered geologist or professional engineer with expertise in soils or foundations engineering, or by a certified engineering geologist. Because the city staff may not contain the expertise necessary to evaluate the adequacy of a report, the city may employ, at the applicant's expense, an appropriate expert to evaluate the adequacy of the report. (Ord. 628 §2(part), 1987).

**Commented [RG2]:** We recommended adding the detail highlighted here to replace the out-of-date references proposed to be struck in the proceeding sentence.

## LUP Chapter 5 Natural Hazards: Policy VII-2:

All geologic/engineering reports required by the City pursuant to the policies of this component shall be prepared by a qualified geologist/engineer according to the guidelines for practice issued by the California Geologic Survey and shall be based on the best available, professionally accepted science and scientific guidance to project sea level rise and other climate change related environmental changes, coastal erosion, bluff failure, flooding, and other coastal hazards. Reports shall consider a range of erosion and sea level amounts based on various time horizons so as to understand the coastal hazards risks and potential adaptation pathways for the proposed development, and all development shall be sited to maintain a minimum factor of safety against land sliding of 1.5 (static) and 1.1 (pseudo static) for a period of 50 years. Division of Mines and Geology, specifically CDMG notes Numbers 37 (Guidelines to Geologic/Seismic Reports), 43 (Recommended Guidelines for Determining the Maximum Probably Earthquakes, 44 (Recommended Guidelines for Preparing Engineering Geologic Reports), and interpretive Coastal Commission for Bluff Top Development.

**Commented [RG3]:** This language mirrors the language suggested for IP Section 17.68.160 directly above.

## Minor miscellaneous typos:

- LUP Policy II-7: “b” needs to be updated to “a” because was the “a” bullet struck.
- LUP Policy VII-8: “Implementation b” needs to be updated to “Implementation a” because a was struck.