

# Exhibit F

This page intentionally left blank.

**CALIFORNIA COASTAL COMMISSION**

CENTRAL COAST DISTRICT  
725 FRONT STREET, SUITE 300  
SANTA CRUZ, CA 95060  
PHONE: (831) 427-4863  
FAX: (831) 427-4877  
WEB: WWW.COASTAL.CA.GOV



April 20, 2021

John Dugan, RMA Deputy Director  
Monterey County Resource Management Agency  
1441 Schilling Place, South 2nd Floor  
Salinas, CA 93901

Subject: Future Big Sur Coast Land Use Plan Amendments

Dear Mr. Dugan:

We appreciate you making the time for a zoom call to discuss the County's plans to amend the Big Sur Land Use Plan (LUP). I want to take the opportunity to follow up on our March 3, 2021 conversation where we discussed the options regarding the content and process of the amendment. We acknowledged the fact that the LUP is 35 years old and contains information that is outdated, and in some cases, no longer relevant, but that it nevertheless continues to be effective in ensuring protection of Big Sur's coastal resources while providing for appropriate public and private development. We further acknowledged that the day-to-day realities in Big Sur have changed significantly from three decades ago and that the LUP could benefit from some type of refinement. We'd like to reiterate, however, that we believe that is in the best interest of the County and the community to submit focused LUP amendments addressing a specific issue area versus a single wholesale update. A targeted approach would more quickly address urgent matters (e.g., fire safety/fuel management) rather than spending very limited Commission and County staffing resources on addressing other complicated coastal resource issues (e.g., coastal hazards, ESHA, public recreational access, and Highway 1 issues). It is not that these issues could not benefit from some type of refinement, but rather it's an acknowledgement that just one of these issues will demand significant and limited Commission and County staffing resources, let alone when packaged altogether in a singular update. And, as we've previously discussed and made very clear, we do not believe that the Big Sur LUP needs this type of comprehensive overhaul.

For example, with regard to the fire issue, Commission staff has been collaborating with the California Board of Forestry, CalFire, and Department of Parks and Recreation, among others, to develop a list of standards and best management practices that potentially could form the basis for a programmatic approach to fire safety and fuel management in Big Sur and elsewhere on the Central Coast. Much of what is being developed follows the recommendations of the California Vegetation Treatment Program with necessary modifications to ensure Coastal Act consistency, and at this time is focused on permitting Cal Fire's vegetation treatment activities statewide, though local, regional, and state agencies could also potentially employ the same or similar treatment strategies. The tenets of this program could lend itself well into the Big Sur

## **John Dugan (Future Big Sur Coast LUP Amendments)**

LUP. As a result, we believe that given the complexity and urgency of this specific issue, along with the staff time and resources necessary to review and develop appropriate LUP policy recommendations for just this one issue, calls for a more targeted approach to amending the LUP in the near term. We also strongly suggest that given the resources involved, and to reduce the risk of loss of life and property, that the County prioritize this specific LUP amendment over other potential LUP issue areas.

We know that the community, through the LUAC, has spent a great deal of time working on a more wholesale update and we have previously commented on that process on numerous occasions, including through our staff comment letters specific to the Big Sur LCP update dated January 6, 2020 and September 25, 2020 that we have attached for reference. These letters have pointed out both substantive and procedural issues related to that process that would need to be addressed. We nevertheless understand that your staff has reviewed and refined the LUAC's proposed updated LUP document, and may use that refined document as the starting place for discussion and analysis of discrete targeted issue areas including for the reasons given above. We will continue to assist the County with that effort consistent with our staffing constraints. We look forward to continuing to collaborate with you and County staff to address issues in Big Sur. If you have any questions or would like to discuss this matter further, please feel free to contact me.

Sincerely,

Mike Watson  
Central Coast District  
California Coastal Commission

Enclosures: January 6, 2020 letter from Mike Watson to John Dugan  
September 25, 2020 letter from Susan Craig to Carl Holm

**CALIFORNIA COASTAL COMMISSION**

CENTRAL COAST DISTRICT  
725 FRONT STREET, SUITE 300  
SANTA CRUZ, CA 95060  
PHONE: (831) 427-4863  
FAX: (831) 427-4877  
WEB: WWW.COASTAL.CA.GOV



September 25, 2020

Carl Holm, Director  
Monterey County Resource Management Agency  
1441 Schilling Place, South 2nd Floor  
Salinas, CA 93901

Re: Potential Big Sur Coast Land Use Plan Amendment

Dear Mr. Holm:

We appreciate the opportunity to follow up on our quarterly Coastal Commission-Monterey County staff coordination meeting (on July 31, 2020) where we discussed the recent Big Sur and South Coast Land Use Advisory Committees' (LUACs') letter (dated July 13, 2020) regarding a potential Big Sur Coast Land Use Plan (LUP) update. As we discussed and as our respective staffs agreed at the meeting, we continue to believe that the existing LUP, although some thirty-plus years old, continues to remain effective in ensuring protection of the Big Sur coast's coastal resources while also providing for thoughtful public and private development within an ever-changing environment. At the same time, we all acknowledged at our meeting that there have been some significant changes related to Big Sur (e.g., in population, traffic, visitation, fire frequency/severity, community needs, etc.) since certification of the LUP in the 1980s, and that the LUP could benefit from some targeted improvements focused on issues related to such changes.

However, we continue to believe, as we have indicated before (including in our January 6, 2020 letter, attached) and as we discussed on July 31st, that the Big Sur LUP does not need a complete overhaul/rewriting of the type currently proposed by the LUACs. Further, some of the LUACs' current suggestions for an updated LUP appear to raise some significant Coastal Act consistency issues, particularly with respect to environmentally sensitive habitat area (ESHA) and public recreational access/California Coastal Trail issues, which brings with it a series of problems of its own. As such, it does not appear wise to us to pursue this type of wholesale update, particularly where the benefits would not appear to outweigh the significant costs to achieve same, especially in terms of the staff time it would take for both the County and the Commission. We continue to recommend that the County take a more surgical approach to the LUP.

Having said that, we also know that your staff has reviewed and refined the LUACs' proposed updated LUP document and may use that refined document as the starting place for an LCP amendment proposal. Either way, whether you choose the update or the more surgical approach, we of course will do everything we can consistent with our staffing constraints to assist you in that effort. We will need your guidance on which

**Carl Holm, Director RMA**  
**Potential Big Sur Coast LUP Amendment**  
**September 25, 2020**  
**Page 2 of 3**

approach you intend to pursue, and we will need to decide on how best for us to provide you our input. For example, even the refined wholesale update document that you shared is over 150 pages of cross-through and underline edits by multiple individuals (all in different colors) with a variety of notes in the margin, making it difficult to follow, especially in terms of what is proposed to be changed in relation to existing certified text. Further, it is lacking explanation for the changes that are being made, many of which are simply not self-evident. If this approach is chosen, we are going to need to discuss the best way for this information to be provided, and then the best way for us to provide input. As a wholesale update, a discussion of the objectives behind the proposed changes and potential options for how best to modify the document to meet objectives (in as clear and concise a format as possible) is probably a required precursor to subsequent policy discussions. Either way, we look forward to continuing to collaborate with the County to address issues in Big Sur, in much the same way we have engaged with County staff on other major planning and regulatory matters over the years.

On that point I think that it is important to note that the LUACs' letter raised some questions regarding the proper role of the Commission and Commission staff in any potential LUP amendment process. As noted, Commission staff will do our best to assist the County as draft LUP changes are developed, including to provide recommendations on language that we believe best solves identified problems and adheres to the Coastal Act. We always strive in that effort to reach consensus, and at a minimum to narrow any potential differences before final Board action as much as possible. And even after a final Board action, we will of course continue to work with the County in the same manner, including as we develop a recommendation to the Coastal Commission. We too want a successful LUP amendment outcome. Ultimately, the Coastal Commission will deliberate and decide, following a public hearing, what LUP changes are appropriate and can be found consistent with the Coastal Act. That is their role, and they too are looking for a successful outcome. I know you understand this, and hope that you or your staff can convey this information to the LUACs in light of the statements in their letter that challenge this process. We are also available to help communicate this to the LUACs if it would be helpful.

Finally, we look forward to potential LUP amendment collaboration here. And, as discussed and agreed to on July 31st, we too believe that it makes the most sense to have discussions on draft language as early in the process as possible as a means of fleshing out potential issues and problems and identifying solutions to same. As you know, that is how our collective staffs have successfully engaged for many years, and we intend to continue engaging in this manner to reach a successful LUP outcome.

If you have any questions or would like to discuss this matter further, please feel free to contact me or Mike Watson of my staff in the Commission's Central Coast District Office.

**Carl Holm, Director RMA**  
**Potential Big Sur Coast LUP Amendment**  
**September 25, 2020**  
**Page 3 of 3**

Sincerely,

Handwritten signature of Mike Watson in cursive script.

Susan Craig  
Central Coast District Manager  
California Coastal Commission

Enclosed: January 6, 2020 letter from Mike Watson to John Dugan

cc: Mary Adams, District 5 Supervisor  
Mary Trotter, Chairperson Big Sur Coast LUAC  
Harry Harris, Chairperson South Coast LUAC  
John Dugan, Deputy Director RMA Planning

**CALIFORNIA COASTAL COMMISSION**

CENTRAL COAST DISTRICT OFFICE  
725 FRONT STREET, SUITE 300  
SANTA CRUZ, CA 95060  
PHONE: (831) 427-4863  
FAX: (831) 427-4877  
WEB: WWW.COASTAL.CA.GOV



January 6, 2020

John Dugan  
Deputy Director  
RMA Planning  
1441 Schilling Place, South 2<sup>nd</sup> Floor  
Salinas, CA 93901

**Re: Big Sur Coast Land Use Plan Update**

Dear: Mr. Dugan:

Thank you for the opportunity for Commission staff to provide a few overarching observations at this juncture of the Big Sur Coast Land Use Plan (LUP) update. The current LUP was certified by the Coastal Commission in 1986 after an extensive public planning effort spearheaded by County and Commission staffs and involving Big Sur community members, other interested individuals, groups, and public agencies. The Commission found that the LUP was adequate to carry out the policies and standards of the California Coastal Act as it relates to the kinds, locations, and intensities of development, natural resource protection, management of the Highway 1 corridor, provision of public access, scenic resource protections, and more. This document, while more than 30 years old, remains pertinent today and has done an exemplary job of protecting the scenic and natural character of the Big Sur coast while providing for careful public and private development within a continuously changing environment. In sum, the LUP is in many ways the gold standard of land use planning in California and the nation, and the Big Sur region deserves no less to ensure appropriate management of its unparalleled coastal resources.

Looking ahead, Commission staff acknowledges that there have been changes in population, traffic, visitation, fire frequency and severity, and community needs, among other things, in the Big Sur area since the LUP was certified in 1986. These changes have resulted in issues that need to be addressed, and thus taking a fresh look at some of the LUP's policies in order to address these issues is warranted. We agree that portions of the LUP could be updated within this lens. However, we do not believe that a wholesale rewrite or comprehensive update, as is what is currently being proposed, is the appropriate manner to address Big Sur's needs, nor do we believe that a comprehensive update is warranted, necessary, or approvable by the Commission. From what we have reviewed, there appear to be a number of fundamental flaws with the draft language that would prevent the Commission from adopting said changes as consistent with the Coastal Act; which is the standard of review for LUP amendments. For example, proposed changes to the definition of environmentally sensitive habitats, hazard avoidance measures, and the modifications to the general and specific public access policies raise serious Coastal Act consistency issues.

**John Dugan**  
**Big Sur LUP Update**  
**January 6, 2020**  
**Page 2**

Accordingly, we strongly recommend that, in lieu of a comprehensive LUP update, the amendment be focused on a select few issues (e.g., short-term rentals, fire/fuel management, Highway 1 management, etc.) where there is a potential need for modifying language, and where said language comports with the applicable policies of the Coastal Act. We believe that such targeted review of specific identified issue areas will significantly truncate the time and resources needed to process such an LUP amendment, as compared with an entire LUP update, including since many of the issues raised can be addressed within the context of the current LUP. We stand ready to assist the County in any way we can to resolve said issues.

Thank you again for the opportunity to provide these observations on the current draft amendment to the Big Sur LUP. We look forward to being more fully engaged when the public review draft is available. If you have any questions or would like to discuss this matter further, please feel free to contact me.

Sincerely, . . .

A handwritten signature in black ink that reads "Mike Watson". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Mike Watson  
Coastal Planner  
Central Coast District Office

This page intentionally left blank