

CALIFORNIA COASTAL COMMISSION

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December 30, 2020

Santa Cruz City Council
809 Center Street, Room 10
Santa Cruz, CA 95060

Subject: Proposed Front Street/Riverfront Project

Dear Mayor Meyers and Councilmembers:

This letter is intended to clarify and refine our November 10, 2020 letter to the City Council on the above-referenced Front Street/Riverfront project. Since that time we have had an opportunity to further discuss the project and the applicable Local Coastal Program (LCP) provisions with your staff, and now have a better understanding of both. While the project continues to exceed the LCP's base size and scale requirements applicable to this site, it appears that most of the exceedances can be allowed by the LCP subject to decision-making body discretion. While we still have some concerns about exercising such discretion to allow for the increased size and scale in this case, we better understand City staff's recommendation. Please consider the following.

We continue to believe that the LCP identifies base maximum size and scale requirements, and base building articulation/variation requirements, for a reason, and that reason is to set the maximum parameters within which a project can be accomplished without significant adverse coastal resource impacts. The City and the Commission did that here in 2018 when the City's Downtown Plan was amended to modify development standards for this and other downtown sites. For better or worse, though, and in addition to such base requirements, the final version of the LCP's amended Downtown Plan includes other provisions that allow for discretionary exceptions to these base standards, including with respect to height and upper floor variation. We have discussed these matters with your staff and can understand why they intend to recommend that you apply your discretion in that respect. Again, and given these baseline standards were established for a good LCP reason, we don't necessarily agree that the exceptions are warranted in this case, but we now understand from where they emanate and why.

Ultimately, we continue to advocate that any LCP-allowed exceptions here be carefully evaluated in terms of the degree of public benefit/coastal resource enhancement derived from the project, and would posit that the discretion you are afforded by the LCP is based on that premise. Thus, in considering these exceptions, we strongly encourage you to focus on the benefits to coastal resources that can come from enhancing public spaces and public utility on the San Lorenzo River side of the project, including to make a more meaningful connection for the public to the River, and on whether such exceptions are actually necessary to derive those benefits. To us, the Downtown Plan

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LCP amendments were premised on this core principal first, followed by the need to ensure that any resultant projects were visually sensitive not only to that river context, but in terms of public views more generally. From our perspective, it is simply not clear that the proposed exceptions are necessary in this case to achieve those benefits, and they undoubtedly have the effect of increasing coastal resource impacts related to public views and riverfront aesthetics.

In addition, we very much recognize the need for affordable housing in Santa Cruz, and strongly support affordable housing in the coastal zone and in Santa Cruz's downtown. In fact, the Coastal Act directs that development, including affordable housing units, be provided in places where there are adequate facilities to serve such development, especially where such units can contribute to walkable, vibrant, and sustainable communities. The Coastal Act and LCP clearly encourage the provision of affordable housing, which we also know to be a City goal, and believe that the degree of affordable units provided is also an appropriate LCP metric to consider for any exceptions.

We hope that this letter helps to clarify our position regarding the LCP issues as they affect this proposed project. Ultimately, we are supportive of a project at this location that can maximize enhancement of public spaces and utility along the river and that can maximize affordable housing, but continue to have concerns about the discretionary exceptions proposed, including because it is not clear to us that the proposed exceptions are in fact necessary nor supportable under the LCP in this case. If you have any questions or would like to discuss these matters further, please contact me at (831) 427-4863.

Sincerely,



Ryan Moroney
Central Coast District Supervisor
California Coastal Commission

cc: SC Riverfront LLC, Front Street/Riverfront Project Applicant
Lee Butler, City of Santa Cruz Planning and Community Development Department Director