



**County of Santa Cruz Board of Supervisors  
Agenda Item Submittal**

**From:** Planning: Sustainability and Special Projects  
(831) 454-2580

**Subject:** Cont'd public hearing Safety Element Update and Implementing Ordinance Amendments

**Meeting Date:** December 10, 2019

**Recommended Action(s):**

- 1) Complete the continued public hearing on the proposed amendments to the Public Safety Element and the Conservation and Open Space Element of the General Plan / Local Coastal Program (GP/LCP), and of the proposed amendments to Chapters 16.10, 16.13, 16.20 and 16.22 of the Santa Cruz County Code; and
- 2) Adopt the attached resolution adopting the CEQA Negative Declaration and updating and amending the GP/LCP Safety Element and Conservation and Open Space Element, and directing staff to submit the Local Coastal Program amendments to the Coastal Commission for certification; and
- 3) Adopt the attached ordinances amending the County Code and Local Coastal Implementation Plan as related to Chapter 16.10 Geologic Hazards, Chapter 16.13 Floodplain Regulations, Chapter 16.20 Grading Regulations, and Chapter 16.22 Erosion Control.

**Executive Summary**

The project consists of an update of the General Plan/Local Coastal Program (GP/LCP) Safety Element addressing seismic hazards, slope stability, climate change, coastal bluffs and beaches, grading and erosion hazards, flood hazards, fire hazards, and environmental justice. The Conservation and Open Space Element of the GP/LCP is also being amended, however that consists only of deleting the existing Air Quality section in that Element to shift Air Quality policies into the new Public Safety Element. To implement the GP/LCP Safety Element updated policies, it is also proposed to amend and add County Code Title 16 chapters addressing geologic hazards, floodplain regulations, grading regulations, and erosion control. The topic that has attracted the most public input is that of Coastal Bluffs and Beaches ("CB&B" - Section 6.4 of proposed GP/LCP). The CB&B policies are being updated to address climate change and sea level rise.

At this time, it is recommended by staff and the Planning Commission that the Board of Supervisors complete its public hearing and then take action to adopt the Negative Declaration, approve the proposed amendments, and refer the Local Coastal Program amendments to the California Coastal Commission for certification. The amendments would go into effect outside of the coastal zone 30 days after adoption, and within the

coastal zone upon final certification by the Coastal Commission.

## **Background**

This staff report for the December 10<sup>th</sup> Board meeting provides further information only as related to coastal bluffs and beaches policies and regulations; the prior staff report for the October 8, 2019 meeting is attached and provides more comprehensive information regarding aspects of the proposed amendments, and not repeated herein.

The Board of Supervisors received a staff presentation and opened the public hearing for the proposed update and amendments at its meeting of October 8, 2019. At that meeting, the Board considered and indicated its intention to pursue adoption of a Staff Alternative to the GP/LCP Section 6.4 Coastal Bluffs and Beaches policies. The Board acted to refer that material to the Planning Commission for review and recommendation because it was substantively different from what the Planning Commission had forwarded as its recommendation to the Board. The Board also directed certain changes to the Alternate Section 6.4 and additionally authorized staff to make further changes to Section 6.4 and implementing ordinances as needed to clarify text and policies, reflect the alternate, and ensure internal consistency.

The Planning Commission considered the Section 6.4 Alternate at its meeting of November 13, 2019 and took unanimous action to support the Alternate, also directing certain additional changes and authorizing staff to make further changes as needed to the section and to implementing ordinances in order to ensure clarity and consistency. Since the time that the Board opened its public hearing on October 8, 2019, staff has incorporated changes as directed by the Board and the Planning Commission, has held meetings with stakeholders including representatives of Pajaro Dunes and the Coastal Property Owners Association as directed by the Board and incorporated further clarifications, and has considered additional public input obtained in connection with the November 13<sup>th</sup> Planning Commission meeting in order to make further refinements for clarity of the proposed policies and regulations.

The proposed Section 6.4 CB&B is no longer considered a Staff Alternative; the revised version therefrom is now considered the Recommended Section 6.4 proposed amendments. Further, the attached strikeout-underline of the Safety Element which includes Section 6.4 reflects changes from the *existing adopted* Public Safety Element to reflect the *currently proposed* Public Safety Element (i.e. the variety of changes along the way toward the final proposed Element are not captured in the strikeout-underline). A more detailed description of the changes made in response to Board and Commission direction, and to stakeholder and public input, is presented in the section of this report that follows the below summary of key aspects of the final proposed CB&B amendments.

## **ANALYSIS**

### **Summary of Approach and Key Aspects of Final Proposed Amendments to GP/LCP Section 6.4 Coastal Bluffs & Beaches Policies and SCCC Chapter 16.10 Geologic Hazards**

The final set of recommended Coastal Bluffs and Beaches (CB&B) policies reflects an approach that varies depending upon the geographic and developed contexts of

property locations. The *geographic contexts* reflect Santa Cruz County’s location along the Monterey Bay, with different site orientations to the Bay resulting in different oceanographic and erosion/deposition forces, and county locations along the Bay also different from other locations in California which are more directly affected by forces of the Pacific Ocean. The *developed contexts* differ due to the historical pattern of development, with most urbanized areas being “existing developed areas” at the time the Coastal Act was adopted, and with over one-half of the urbanized area already protected by permitted shoreline protection structures that protect existing development. Some coastal bluff areas already have very narrow shorelines with occasional pocket beaches. Other areas contain broad beaches that are heavily used by the public and visitors from around the world, and those have highest priority for ensuring continued public access to beaches for the long-term future.

The general hierarchy within the County unincorporated area is presented below:

<b>APPROACH BY AREA</b>	<b>AREA</b>
Shoreline Protection Exception Area Pursue GHAD & Modern Replacement Seawall w/ public access	Opal Cliffs/41 <sup>st</sup> Avenue to Capitola limits
Incentivized Managed Retreat/Conditional Accommodation One Time Projects; unless Shoreline Management Plans refine vision	Twin Lakes to Soquel Point and South county urban areas
Protect Beaches/Coastal Lagoons; One Time >50% Project Max 10’ elevated structures; no new shoreline protection	Beaches/Coastal Lagoons
Managed Retreat; no new shoreline protection structures	Outside Urban/Rural Services Line

As compared to the County’s existing CB&B policies in its adopted and certified General Plan and Local Coastal Program, the Update provides a much more robust strategy to address existing impacts of shoreline protection structures, through required evaluation and improvements and/or mitigations when coastal development permits are requested for projects that involve new or reconstructed structures. The threshold for being considered new or reconstructed is being lowered from modification of 65% of Major Structural Components (MSC) of an existing structure to 50% of MSC (described as “>50% MSC”). Either on-site, in-kind or in-lieu fee mitigations will be required in order to address impacts of development (and of shoreline protection structures) on sand supply to beaches and on public recreation coastal resources.

The proposed 2020 Safety Element Update has a stated 20-year time horizon, with the next 2040 update able to consider conditions and science as they evolve, and appropriate adaptive policies included within the 2040 update. The 2020 Update and implementing regulations incorporate a “medium risk aversion” scenario, meaning a 5% probability that sea level rise meets or exceeds 0.9 feet between the 2000 base year and the year 2040 (and from 3.1 to 4.3 feet from 2000 to 2100) based on the Coastal Commission’s Sea-Level Rise Guidance projection for Monterey.

Along the coast, climate change over the next 20 years will most likely be experienced as more damage in certain locations from more intense storm wave/surge activity, and

greater impacts over a broader area are expected in the decades beyond 2040. For this reason, the CB&B policies proposed by Santa Cruz County reflect a strategy over the next twenty years of “Managed Retreat” (and no new shoreline protection) for areas located *outside* of the Urban and Rural Services Line, measures to preserve beaches and coastal lagoons, and “Incentivized Longer-Term Managed Retreat” for certain existing developed/urbanized areas located *inside* the U/RSL - which the Update also terms “Conditional Accommodation, Acceptance of Risk, and Adaptation”.

“Incentivized Managed Retreat” is shorthand for a strategy that allows properties within the Urban and Rural Services Lines (i.e. urbanized areas) to pursue one new or >50%MSC project after the effective date of the Update, in exchange for acceptance of a package of conditions of approval, mitigation measures and agreements for potential future activities and triggers based upon conditions as they evolve in the future - essentially agreeing to an adaptation program for the subject site, up to and including the potential for future abatement and removal of structures in the long term as effects of sea level rise become dangerous and/or infeasible to avoid or manage.

Incentives to prepare Shoreline Management Plans (SMP) are incorporated into the proposed policies, including but not limited to the possibility that an adopted SMP would designate certain additional areas as a “Shoreline Protection Exception Area” - designated to be protected for the long term in a manner that reduces impacts on coastal resources such as by replacement of rip rap and disparate materials with a new modern vertical seawall with integrated public access. The Opal Cliffs area from Soquel Point to the Capitola city limits would be designated a Shoreline Protection Exception Area at the time of adoption of the 2020 Update, with owners encouraged to work with the County to form a Geologic Hazard Abatement District (GHAD) and pursue a modern unified project that incorporates public access.

The County’s proposed approach is practical, and legally and politically supportable. It does not take a view that there is an immediate urgent crisis that coastal properties are experiencing that supports extreme restrictions on use of private properties at this time, but an “engage, accept and get ready” approach. Under the County’s approach, both the public sector, potential GHADs and property owners become aligned over the next 20 years in a manner that provides public benefits (including protection of critical public infrastructure and mitigation of development impacts on coastal resources), and ensuring internalization of private property risks and of future costs of repair and abatement that will result from increasing impacts of climate change and sea level rise.

As one of the conditions of accepting the coastal development permit, owners would be required to record on title/deed for the property a Notice of Geologic/Coastal Hazards, Acceptance of Risk, Release of Liability and Indemnification. Shoreline protection structures would be governed by a Monitoring, Maintenance and Repair Program, with 5-year reports and other requirements and activity triggers based on conditions that are determined to exist in the future. Current and future owners are thereby put on notice and accept the risks of damage from hazards, as well as to meet requirements to reduce existing and/or mitigate future impacts, including the potential for future additional “rounds” of mitigation every 20 years that shoreline protection structures continue to exist. The Notice and conditions would also acknowledge that at some point in the future, it may not be feasible to retain certain improvements in certain areas, for a

variety of reasons including but not limited to migration of the mean high tide line and public trust lands inland, and practical/economic infeasibility to repair/ maintain certain structures due to physical or dangerous conditions. Technical experts retained by the property owner, along with the County and potentially Coastal Commission, would be involved in making those future determinations on a site-by-site basis.

In summary, the key points of the proposed CB&B policies include the following:

- The 2020 Public Safety Element and CB&B policies would have a **Twenty-year Horizon**, with updated policies to be adopted within a future 2040 Safety Element.
- The projection for sea level rise (SLR) would reflect a **Medium Risk Aversion** scenario, which means a 5% (1 in 20) probability that SLR will be 0.9 feet from 2000 baseline to year 2040, and 3.1 to 4.3 feet from 2000 baseline to year 2100.
- **Locations outside of the Urban and Rural Services Lines (USL/RSL)** would not be eligible to obtain permits for shoreline and coastal bluff protection structures, and significant remodel (>50% of Major Structural Components, or 50% of value in FEMA zones) and new development projects would be required to provide a 75-year geologic setback (100 years for critical structures) which would be established without consideration of any existing protection structure. This is essentially the “**Managed Retreat**” strategy that has been favored by the California Coastal Commission.
- The **Opal Cliffs Drive area between Soquel Point and the Capitola city limits** would be designated a **Shoreline Protection Exception Area**, reflecting that the vision for the area would be comprehensive implementation of a modern vertical seawall like the RDA seawall that was constructed along East Cliff Drive and parkway, including public access and aesthetic improvements. Owners would be encouraged to form a Geologic Hazard Abatement District (GHAD) so that a project can be designed and implemented in a manner that allows costs to be paid over a 30-year period on property tax bills.

In the interim, owners would be allowed to pursue new and reconstruction projects, but would be required to reduce impacts on coastal resources that occur with existing shoreline protection structures, and would be required to accept a package of conditions that include recordation on title of a Notice of Hazard etc., require sand and recreation mitigations/in-lieu fees, and accept “check-ins” every 20 years that likely involve renewal of mitigations/in-lieu fees as well as additional requirements based on then-existing conditions and impacts that are occurring.

- **Locations within the USL/RSL but not included within a Shoreline Protection Exception Area, would be incentivized to collaborate and participate in preparation of a Shoreline Management Plan (SMP).** Starting on the effective date of the 2020 Safety Element, owners would only be allowed to carry out one new/replacement/>50% MSC type of project, unless a future Shoreline Management Plan was adopted that provided otherwise (such as by

designating sub-areas to be additional Shoreline Protection Exception Areas, or other type of alternate strategies). The “one-time” project allowance would also come with the package of conditions described above (reduce existing impacts on coastal resources, provide sand and recreation mitigations and/or in-lieu fees, record Notice of Hazards, accept risk and future adaptation program, etc.). The County would seek SMP grant funding and a SMP would be most beneficial for the Twin Lakes to Soquel Point area.

- **Projects located on beaches/lagoon** areas that are affected by wave run-up (V-zones), that propose to elevate structures above flood level, would be **limited to a “one time” new or >50%MSC project, and a maximum of about 10 feet elevation above grade**, which essentially means about a “one story” non-habitable space below one habitable story given zoning height limits, in order to prevent a future of structures perched on tall stilts over beach/lagoon areas. Riparian setbacks as required per code would preserve coastal lagoons.
- **The “One Time” New or >50% MSC Projects would be calculated from date of adoption of the 2020 Safety Element Update.** Currently, County of Santa Cruz considers only the most recent 5-year timeframe, for the calculation of % change to major structural components that defines the threshold for “reconstruction”. The California Coastal Commission has more recently emphasized a calculation that is cumulative from the time that the Coastal Act was adopted in the 1970s. Given lack of constructive notice to property owners, differences in calculations/definitions that have been applied over time by the CCC and local governments, and the lack of accurate records back to the late 1970’s, the County is proposing to “start the calculations” from the date that the 2020 Safety Element is adopted. This is a significant shift from the current 5-year calculation that rolls forward and essentially gets to zero each 5 years.
- **A new “Geologic Setback Reduction Exception” provision is added to the regulations**, whereby an owner could request a geologic setback exception which would reflect a reduced setback from the bluff edge, and thus a shorter expected design life of the improvement. A package of conditions of approval would be required, to recognize that future damage may occur within a shorter timeframe and result in the need to remove/abate structures. In this way, a project may be approved that does not meet the standard 75-year geologic setback, but if approved for a reduced geologic setback of 45 years, for example, then that is reflected within the Notice recorded on title and in the MMRP, and all parties are on notice that the structure is has a shorter expected life than typical and may need to be abated in approximately 45 years and those costs will be borne by the private property owner.

### **Description of Changes Made to October 8<sup>th</sup> “Staff Alternate” to Incorporate Board and Commission Direction and Public Input**

Direction provided by the **Board of Supervisors** on October 8, 2019 included:

- Indicated Board intention to pursue Staff Alternative Section 6.4 CB&B, therefore provided direction for certain changes to that Alternative, directed that staff to make any necessary changes to the implementing ordinances to ensure

consistency with the policies of the Alternative, authorized staff to make other changes to clarify and ensure internal consistency, and referred the Staff Alternative Section 6.4 to the Planning Commission for its review and recommendation;

- Directed staff to work with stakeholders, obtain and review litigation language as referenced from the San Diego case regarding indemnification and determine whether further modifications to the proposed language are necessary;
- Explain more clearly in the amendments that new regulations are not going to affect existing permit conditions or existing improvements; new requirements would only be applicable as new coastal development permits are sought by property owners;
- Explore the use of policy and ordinance tools to incentivize the removal of riprap along the coastline, which would increase access to usable beach by the general public - i.e. there should be an incentive for owners to collaborate and participate in preparation of Shoreline Management Plans;
- Include language regarding design of coastal armoring structures and conditions of approval, to take into account offshore resources including but not limited to surfing areas and sand mitigation;
- Prior to the December 10<sup>th</sup> continued public hearing by the Board, meet with stakeholders to answer questions and engage in useful dialogue that could help further clarify the final policies and implementing regulations; and
- Staff and Planning Commission to consider the sand mitigation fees, especially in South County to ensure that they are justifiable, and possibly exempt Pajaro Dunes (as a sand depletion/accretion area that seasonally occurs naturally each year).

As a result of **Planning Commission** direction and associated public input, the following information or clarifications have been incorporated:

- Clarified that terms of existing permits are not affected by updated policies; applications for new coastal development permits and acceptance of permit conditions are the activities addressed by the updated policies and requirements.
- Recognized that removal of riprap requires coordinated action by multiple property owners because riprap protection often spans multiple properties and is interconnected. The policy encouraging groups of property owners to develop Shoreline Management Plans provides a collaborative mechanism for addressing this situation in a comprehensive manner. Modern vertical seawalls are preferred for areas where protection is allowed; with some potential to integrate existing protection materials, such as by a modest level of rip rap at the base of new modern vertical walls (Board direction, Policy 6.4.37; also Planning Commission direction re integration).

- The policy regarding shoreline and coastal bluff armoring requires consideration of oceanographic conditions affecting the site and assessment of impacts on shoreline processes, sand supply, and recreational resources. Combined with the guiding principle that shoreline development may have impacts on surfing resources, the Safety Element provides adequate direction for staff to consider these types of potential impacts of certain proposed projects as warranted. (Board direction, Policy 6.4.25)
- Staff was not able to verify a “San Diego case” regarding indemnification. The public commenter sent a follow-up link to a newspaper article on a different subject regarding sanctioning of certain Coastal Commission members for improper ex-parte communication. However, after meeting with property owner stakeholders, some adjustment to the waiver of liability and indemnification language was incorporated into the proposal. Staff believes these stakeholders are now satisfied. (Board direction)
- The policy addressing shoreline and coastal bluff armoring includes requirements to mitigate adverse impacts on sand supply and recreational resources. The provision in the policies for payment of mitigation fees has been clarified to specify that sand mitigation fees do not apply in beach/dune environments because the established fee only applies to coastal bluff environments, and dunes/beaches are generally naturally re-established on a seasonal basis. The recreation mitigation fee has been clarified to specify that the fee calculation would be the same method as is used by the County to establish charges for encroachments on county-owned property in the coastal zone. (Board direction, Policy 6.4.25(j))
- A change was made to the introduction to highlight the need to protect natural lagoon processes as roads like East Cliff Drive cross coastal lagoons, and bridges may be needed in the future. (Planning Commission direction)
- Clarification of the discussion regarding building heights and maximum elevation of structure (approximately 10 feet) to emphasize this applies to projects on beaches and not on coastal bluffs. (Planning Commission direction)
- Revised discussion of desired area(s) for development of Shoreline Management Plans. (Planning Commission direction)
- Deleted the discussion early in Section 6.4 regarding differences in interpretation of the Coastal Act regarding “existing” v. “new” structures. (Planning Commission direction)
- In the Shoreline Protection Exception Area where armoring would be allowed, indicated that existing armoring may be integrated into a new armoring structure if appropriate, such as a modest incorporation of rip rap material at the base of a new modern vertical seawall. (Planning Commission direction)

- Added a reference to the require riparian setbacks in the discussion regarding development along coastal lagoons. (Planning Commission direction)
- Added a guiding principle regarding coordination on regional sediment management (Planning Commission direction)
- Requirements for periodic reporting on monitoring maintenance and repair of existing armoring and review of technical reports was modified to require that monitoring reports shall be reviewed and accepted by the County. (Planning Commission direction, Policy 6.4.25(k))
- Various changes were made to clarify and refine certain guiding principles and policies for internal consistency and clarity. (various pages)
- Appropriate changes have been made to the implementing ordinance Chapter 16.10 Geologic Hazards, to reflect the policy amendments as revised. (Board direction)

### **Environmental Review**

The Initial Study and proposed Negative Declaration for the proposed project was reviewed by the County's Environmental Coordinator and a preliminary determination to issue a Negative Declaration was made on June 20, 2018. The public comment period began June 22, 2018 and expired on August 1, 2018 for a total of 41 days rather than the standard 30 days. In that the set of proposed amendments have the overall effect of strengthening policies and requirements related to public health and safety, no potentially significant impacts were identified, and no mitigation measures were required.

The Initial Study has now been revised to eliminate portions of the previously defined project related to the Noise Element and airport land use compatibility. While initially included within the proposed project description, those matters were subsequently separated from the proposed project and independent General Plan and Local Coastal Program amendments were recently processed. Therefore, text in the Initial Study addressing those issues has been deleted.

Staff has reviewed the Initial Study to ensure that changes to the content of the final version of the proposed amendments do not change any of the conclusions of the Initial Study regarding impacts. Staff has concluded the Initial Study conclusions remain valid, and there are no new or substantially more severe impacts due to refinements included within the final version of the proposed amendments. The changes either clarify or reinforce policy language and remain consistent with the earlier version of the proposed amendments. The designation of the Opal Cliffs area as a Shoreline Protection Exception Area recognizes an urbanized area of the coast that is threatened by erosion and would otherwise qualify for armoring and establishes the type of armoring in terms of engineering design, aesthetics and public access amenities that is preferable in the Exception Area. The vision for the Opal Cliffs area has consistently been the same in all versions of the Safety Element Update; labeling such as a Shoreline Protection Exception Area does not change the analysis or conclusions. The changes further address restrictions related to longer-term expectations for development in other

urbanized areas outside of the Shoreline Protection Exception Area(s) and incentivize creation of Shoreline Management Plans. In addition, the changes clarify that renewal of a Monitoring Maintenance and Repair Program for approved shoreline protection structures may require additional mitigations in future 20-year increments as the structures may be allowed to exist into the future. A Negative Declaration remains the appropriate environmental determination.

### **Consistency of Proposed Coastal Bluffs & Beaches Policies with Coastal Act**

The California Coastal Act (CA) recognizes that the California coastal zone contains valuable natural and coastal resources, which need to be protected in a manner that involves balancing natural areas with urbanized developed areas that contain economic and visitor-serving assets. Maintaining and enhancing public/visitor access to the entirety of the coastal zone with its variety of contexts, as well as considering private property rights, are principles included within the voter-approved Coastal Act. The CA recognizes that existing development, and future developments that are carefully planned and developed consistent with the policies of the CA, are essential to the economic and social well-being of the people of California (CA Section 30001).

Through the Measure J growth management initiative approved by voters, the County of Santa Cruz adopted an Urban and Rural Services Boundary shortly after the Coastal Act was adopted in the 1970's, and it recognizes distinctions between then-existing urbanized and natural/agricultural/open space areas. The County's local policy framework is consistent with the Coastal Act in that it creates an overall balance of natural and coastal resource protection in rural areas, with ongoing residential and commercial land use development within the urbanized areas of the County in a manner that maintains and enhances public access to coastal beach areas as well as visitor-serving urbanized commercial and residential areas.

Due to Measure J and the Coastal Act, rural/agricultural coastal areas of the County have remained mostly undeveloped, the urban area of the County is "built", and approximately half of that urbanized coastline is already armored with various types of shoreline and coastal bluff armoring. Given this context, the proposed coastal bluffs and beaches and shoreline protection policies of Section 6.4 of the Safety Element Update reflect a "hybrid approach" that allows certain future development in the certain parts of the urbanized area to conditionally rely on existing coastal armoring - but would not allow this in rural areas.

The Coastal Commission's 2015 Sea Level Rise Guidance Document (SLR Guidance) recognizes the difficulties of applying CA policies to a wide variety of existing natural and man-made conditions in urban areas, and the importance of considering individual development decisions in context and on a case-by-case basis. The proposed amendments are structured to allow for site specific decision-making while maintaining certain baseline requirements to achieve the appropriate balance of development with coastal resource protection and enhancement, and imposing adaptation measures for the future.

Developed structures, neighborhoods and visitor-serving assets are explicitly addressed by the CA, as meeting social, economic, and recreational needs of Californians. Protection of natural resources and recognition of private property rights are also

guiding principles of the Coastal Act. The proposed Coastal Bluffs and Beaches amendments are consistent with the Coastal Act because they strike an appropriate balance of these various goals through specific project analysis requirements and establishing mitigation and adaptation pathways to improve current conditions and prepare for future sea level rise, including phasing out structures as they become more threatened, repeatedly damaged, or destroyed.

**Financial Impact**

Mitigation fees that are collected from projects involving shoreline protection structures in the future, would improve the ability of the Parks and Public Works Departments to maintain, construct and improve public access to the coast and recreation assets within the County's coastal areas.

**Strategic Plan Element(s)**

Sustainable Environment - Climate Change. The proposed amendments increase resilience to climate change impacts, including sea-level rise and changing weather patterns.

**Submitted by:**

Kathleen Molloy, Planning Director

**Recommended by:**

Carlos J. Palacios, County Administrative Officer

**Attachments:**

Resolution, CEQA Negative Declaration, Public Safety Element Amendments, Conservation and Open Space Element deletions  
Ordinance Chapter 16.10 Geologic Hazards amendments  
Chapter 16.10 strikeout-underline  
Ordinance Chapter 16.13 Floodplain Regulations (new)  
Ordinance Chapter 16.20 Grading Regulations amendments  
Chapter 16.20 strikeout-underline  
Ordinance Chapter 16.22 Erosion Control Amendments  
Chapter 16.22 strikeout-underline  
Public Safety Element strikeout-underline  
Planning Commission Resolution 2019-03  
Planning Commission staff report 10/10/2018  
Planning Commission staff report 12/12/2018  
Planning Commission staff report 3/13/2019  
Board of Supervisors memo without attachments 10/8/2019  
Planning Commission staff report without attachments 11/13/2019