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June 21, 2019

TO: California Coastal Commission

FROM: John Ainsworth, Executive Director
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SUBJECT: Background Report for the July 12, 2019 Local Government Workshop on Short-Term Rentals and Sea Level Rise Planning and Adaptation

I. INTRODUCTION

The California Coastal Commission (hereafter: the Commission) is holding a joint workshop with the League of Cities and California State Association of Counties (CSAC) on Friday, July 12th to discuss issues related to Short-Term Rentals (STRs) and Sea Level Rise (SLR) adaptation and planning, as well as procedural matters related to Local Coastal Program (LCP) development. This will be the fourth workshop held between the Coastal Commission and locally elected officials for the purpose of fostering coordination through the LCP process. This workshop will be moderated by Caelan McGee, Senior Facilitator of Zephyr Collaboration.

This Background Report provides a history of past local government public workshops, as well as a short summary and status of LCP planning and coordination efforts with local governments, including those related to STRs and SLR.

II. WORKSHOP HISTORY

The Commission has held three public workshops conducted with local coastal government officials to discuss topics related to the development of LCPs. These workshops recognize the importance of the Commission's partnership with local governments and the public in carrying out the Coastal Act through the LCP process. Below is a brief summary of each of the public workshops and some of the progress made as a result of those workshops.

2009 Local Government Workshop¹

The first workshop was held during the August 2009 Commission hearing and focused on discussing ways to improve the LCP planning process, including the need for improved communication and collaboration with the Commission. Participants included Coastal Commissioners, the California League of Cities Coastal Cities Issue Group, and CSAC, as well as testimony from members of the public. The workshop was moderated by former Commissioner and County of Sonoma Supervisor Mike Reilly.

In discussing ways to improve the LCP planning process, the workshop discussions centered on improving communication and coordination between Commission staff and local governments; increasing local assistance by providing LCP training and guidance, including through the use of technology to educate stakeholders; and streamlining LCP actions and encouraging a more consistent and predictable process for LCP review. Discussions also noted the financial constraints on the Commission and local governments in implementing program enhancements to address these issues.

In the years following the 2009 workshop, Commission staff worked with local government officials and other stakeholders to address these issues, by for example:

- Increasing regular and early coordination on priority issues, policy development, and procedural matters, including through notification of upcoming items and providing early input to local processes, such as through increased Commission staff participation at local public hearings;
- Streamlining of LCP actions, including through the elimination of a significant backlog of pending LCP amendments;
- Applying for and receiving federal grant funding to continue the Commission’s LCP Communication Initiative work, including through Commission staff participation in the Local Government Working Group and other coastal groups of CSAC and the League of Cities; and,
- Publishing new and updated LCP assistance documents, including the “*Tips/Best Practices for Processing LCP Amendments*”² table and the *Local Coastal Program Update Guide*³, which includes procedural guidance on updating Land Use Plans⁴ and Implementation Plans⁵.

2012 Local Government Workshop⁶

The second public workshop continued the dialogue on ways to renew and enhance the LCP planning process between the Commission and local coastal governments. The workshop was

¹ For the Background Report (staff report) on the 2009 workshop, see: <https://documents.coastal.ca.gov/reports/2009/8/W3-8-2009.pdf>. For a follow-up report of the workshop, see: <https://documents.coastal.ca.gov/reports/2009/10/W13-10-2009.pdf>. To watch a recording of the workshop, see: <https://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2009-08-12&site=cal-span&owner=CCC&date=2009-08-12>.

² See: https://documents.coastal.ca.gov/assets/la/TipsLCPAmend_Nov2013.pdf.

³ See: <https://www.coastal.ca.gov/rflg/lcp-planning.html>.

⁴ See: https://documents.coastal.ca.gov/assets/lcp/LPUUpdate/LCPGuidePartI_Full_July2013.pdf.

⁵ See: https://documents.coastal.ca.gov/assets/lcp/IPUpdate/LCP_Update_Guide_Part_II_IP_Full.pdf.

⁶ For the Background Report (staff report) on the 2012 workshop, see: <https://documents.coastal.ca.gov/reports/2012/12/W3-12-2012.pdf>. For a follow-up report of the workshop, see: <https://documents.coastal.ca.gov/reports/2013/4/F9b-4-2013.pdf>. To watch a recording of the workshop, see: <https://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2012-12-12&site=cal-span&owner=CCC&date=2012-12-12>.

held during the December 2012 Commission hearing and participants included Coastal Commissioners, representatives of the California League of Cities Coastal Cities Issue Group and the CSAC Coastal Counties Caucus, as well as testimony from members of the public. The workshop was moderated by former Commissioner and current Assemblyman Mark Stone.

Discussions during the workshop and comments received prior to the workshop concerned various elements of the LCP coordination process, including efficiency and general communication improvements. For example, while many participants voiced support for the guidance materials prepared as a result of the 2009 workshop, some participants raised concerns about a lack of adequate coordination with Commission staff, specifically with respect to the scope of comments received from Commission staff for LCP amendments (i.e., scope creep) and the process and schedule for review of suggested modifications (e.g., providing suggested modifications later in the LCP development process on issues that should have been discussed earlier). Some discussion also addressed broader communication issues, including perceived inconsistencies in direction from Commission staff or prior decisions on other LCP amendments becoming precedent for future items without adequate communication and input from other local governments.

In addition to these discussions about LCP processes and coordination, participants also recognized how uncertified or outdated LCPs might impact Commission staff workload and their review of LCP amendments. Participants also suggested that workshops on specific, priority Coastal Act topics would be another way to enhance communication with local governments and improve the LCP process overall.

In the years following this workshop, Commission staff worked with local government officials and other stakeholders to address these LCP process issues, by for example:

- Hiring more staff to support LCP planning efforts following an increase in funding approved by the Legislature;
- Awarding planning grants to coastal jurisdictions for LCP planning, including planning to update outdated LCPs and to address sea level rise;
- Continuing to increase and maintain regular and early coordination on priority issues, policy development, and procedural matters;
- Continuing to reduce the backlog of pending LCP amendments and significantly decreasing the average processing time for filed LCP submittal; and,
- Holding additional workshops on priority Coastal Act topics, including agricultural resources⁷ and lower cost visitor serving accommodations⁸, as well as sea level rise guidance.⁹

⁷ For the Background Report (staff report) on the 2013 Agriculture workshop, see: <https://documents.coastal.ca.gov/reports/2013/5/W3-5-2013.pdf>. To watch a recording of the workshop, see: <https://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2013-05-08&site=cal-span&owner=CCC&date=2013-05-08>.

⁸ The Commission has held three workshops on lower cost visitor serving accommodations. For the December 2014 workshop staff report and video recording, see: <https://documents.coastal.ca.gov/reports/2014/12/W3-12-2014.pdf> and <https://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2014-12-10&site=cal-span&owner=CCC&date=2014-12-10>. For the March 2015 workshop staff report and video recording, see: <https://documents.coastal.ca.gov/reports/2015/3/t9-3-2015.pdf> and <https://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2015-03-13&site=cal-span&owner=CCC&date=2015-03-13>. For the November 2016 workshop staff report and video recording, see: <https://documents.coastal.ca.gov/reports/2016/11/th6-11-2016.pdf> and <https://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2016-11-03&site=cal-span&owner=CCC&date=2016-11-03>.

2015 Local Government Workshop¹⁰

The third public workshop was held during the November 2015 Commission hearing and continued dialogue on improving the LCP process, including coordination, as well as discussing the Sea Level Rise Policy Guidance document¹¹ that was adopted a few months prior to the workshop. Participants included Coastal Commissioners, representatives of the California League of Cities Coastal Cities Issue Group and the CSAC Coastal Counties Caucus, as well as testimony from members of the public. The workshop was moderated by former Marin County Supervisor and Chair of the Coastal Commission Steve Kinsey.

The first part of the third public workshop focused on the LCP planning process and continued efforts to improve coordination between the Commission and local governments. Participants discussed the benefits of regular and early coordination to avoid last minute surprises and to respect the local public process by limiting suggested modifications. The discussion also emphasized the need to bring other regulatory agencies, such as the State Water Resources Control Board and the Federal Emergency Management Agency, into the LCP process as early as possible as a way to avoid setbacks later in the planning process. Discussions around the LCP amendment process noted that incremental, phased approval and topical updates may be favorable given that comprehensive updates are time consuming and expensive, though the suitability of this would depend on the local jurisdiction. Participants also noted that greater access to certified LCP language could serve as guidance to those jurisdictions updating their LCPs. It was also requested that there be a high bar for determination of Substantial Issue on appeals of local decisions. Lastly, public comments underscored the need for funding for local planning, while commenters also suggested relying more on CEQA documents to determine coastal resource impacts.

The second part of the third public workshop focused on the Sea Level Rise Policy Guidance document, which at the time was adopted a few months prior to the workshop. Coordination was discussed as vital to sea level rise planning and some local governments considered a multi-agency, regional approach as more suitable to addressing sea level rise than through individual LCPs or individual projects. Participants agreed that it would be important to collaborate with the State Lands Commission to address the Mean High Tide Line as it moves inland. Salt water intrusion and risk to groundwater supplies was also discussed as an important issue to address. Further, some of the discussion covered how armoring would be treated in terms of existing development, new development, redevelopment and repair and maintenance in the context of sea level rise. Participants also identified some specific issues that were raised by the guidance document, including the need for a clearer understanding of what is feasible as well as practicable, how to educate property owners about risk, how to address harbors and marinas where long term leases exist, and whether infrastructure projects should be given priority. Lastly, participants also discussed how public harbor districts, ports and small craft harbors should be

⁹ The sea level rise workshop was part of the 2015 local government workshop. For the Background Report (staff report) on the 2015 workshop, see: <https://documents.coastal.ca.gov/reports/2015/11/f2-11-2015.pdf>. To watch a recording, see: <https://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2015-11-06&site=cal-span&owner=CCC&date=2015-11-06>.

¹⁰ For the Background Report (staff report) on the 2015 workshop, see: <https://documents.coastal.ca.gov/reports/2015/11/f2-11-2015.pdf>. For a follow-up report of the workshop, see: <https://documents.coastal.ca.gov/reports/2016/5/w6b-5-2016.pdf>. To watch a recording of the workshop, see: <https://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2015-11-06&site=cal-span&owner=CCC&date=2015-11-06>.

¹¹ At the time of the 2015 workshop, the Commission had adopted the Sea Level Rise Policy Guidance, which was recently updated in 2018. See: <https://www.coastal.ca.gov/climate/slrguidance.html>.

eligible for future grant funding, while the anticipated lifespan of a structure should be considered when permitting ports and harbor facilities, such as breakwaters.

In the years following the third public workshop, Commission staff has continued to work with local government officials and other stakeholders to address the issues raised in the workshop, by for example:

- Prioritizing working with local governments receiving LCP planning grants to develop or update their LCPs to address SLR;
- Continuing local outreach and education efforts on the adopted Sea Level Rise Guidance document, including through dissemination of exemplary SLR work products to local governments and providing technical assistance;
- Maintaining regular and early coordination on priority issues, policy development, and procedural matters; and,
- Developing new or updating existing LCP assistance documents, including a new memo on New Accessory Dwelling Unit Legislation¹² and updating the Sea Level Rise Policy Guidance document¹³ and the Public Access, Water Quality Protection, and Coastal Hazards chapters of the *Local Coastal Program Update Guide*¹⁴.

Commission Efforts to Improve the LCP Planning Process

One of the Commission’s highest priorities since the first public workshop has been to update and certify LCPs. To date, the Commission has awarded 50 local planning grants through five rounds of LCP grant funding to 37 jurisdictions, totaling \$6,765,750.¹⁵ Grant guidelines include a requirement for jurisdictions to assess sea level rise vulnerability and develop climate change adaptation policies and ordinances. The program has been well received by local coastal governments, as evidenced by the high demand for grant funds totaling just under \$15 million.

To date, the LCP grant program has helped to advance the Commission’s goal of addressing sea level rise and other high priority issues through LCP planning work, as well as updating and certifying LCPs. These achievements include:

- Over 30 completed sea level rise vulnerability assessments;
- More than ten completed standalone adaptation reports;
- Over 30 completed LCP documents, including draft and final Land Use Plans, Implementation Plans, focused amendments, new LCPs, or comprehensive updates;
- Certifications for the City of Solana Beach (LUP amendment, Jan 2014); Marin County (LCP Update, Nov. 2016); City of Newport Beach (New IP, Jan. 2017); San Diego County (LUP Update, May 2017); City of San Clemente (Comprehensive LUP update,

¹² See: https://documents.coastal.ca.gov/assets/rflg/CCC_guidance_memo_re_ADUs.pdf.

¹³ See: https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf.

¹⁴ For the updated Public Access chapter, see:

https://documents.coastal.ca.gov/assets/lcp/LUPUpdate/LUP_Guide_Update_1_Public_Access_updated_4.4.17_FINAL.pdf. For the updated

Water Quality Protection chapter, see:

https://documents.coastal.ca.gov/assets/lcp/LUPUpdate/LUP_Update_Guide_Ch_3_Water_Quality_UPDATED_3.29.17_Final.pdf. For the

updated Coastal Hazards chapter, see: https://documents.coastal.ca.gov/assets/lcp/LUPUpdate/REVISED_DRAFT_LUP%20Guide_Update_8_Hazards_%20Feb_14_2016.pdf.

¹⁵ The figures include \$1,015,750 in Ocean Protection Council (OPC) funding provided in conjunction with the Commission’s Round 2 LCP grant program. Six of the seven Round 2 LCP grantees that received OPC funding also received Commission grant funding. Without OPC grant funding, the Commission has awarded 49 local planning grants to 37 jurisdictions for a total of \$5,750,000.

February 2018); City and County of San Francisco (LUP Amendment, May 2018); and the City of Santa Barbara (Comprehensive LUP update, May 2019¹⁶); and,

- More than 30 LCP actions planned over the next few years, including for example the City of Pacific Grove (Comprehensive Land Use Plan Update and New Implementation Plan, locally-adopted November 2018) and the County of San Diego (New Implementation Plan, to be locally adopted in June or July 2019), as well as other new LCPs, updated LCPs and targeted amendments to address sea level rise.

The Commission’s processing of LCP actions have also continued to improve. In 2018, the Commission received 79 planning-related submittals (amendments, certifications and other submittals related to LCPs, Port Master Plans, Long Range Development Plans and Public Works Plans), 77% of which were filed as complete. The average time from submittal to hearing was 89 days, a negligible increase of 2 days over the 2017 average, and still substantially below the 367-day average in 2010 (see Figure 1 below). Of the 525 coast development permits the Commission acted on in 2018, 516 were approved, four (1%) were denied, and the remaining five were withdrawn. Also in 2018, the Commission considered 50 appeals of local government decisions, and found that 18 of them raised a substantial issue under the certified LCP (26 were found to raise no substantial issue). On de novo review, one project was denied, and five were approved with conditions.

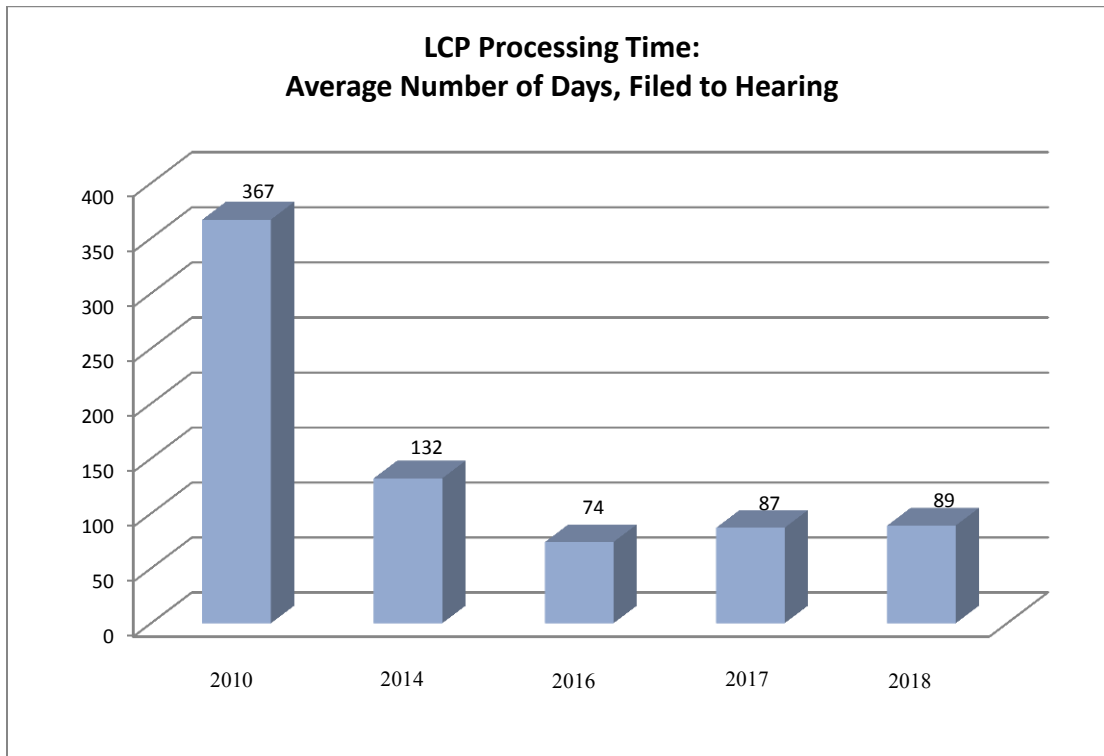


Figure 1. LCP Processing Time

¹⁶ The City of Santa Barbara’s LUP Update was approved with modifications at the May 2019 Commission hearing (see: <https://documents.coastal.ca.gov/reports/2019/5/Th20f/th20f-5-2019-report.pdf>), but still requires local adoption of the suggested modifications and Executive Director sign off, prior to certification.

The previous local government workshops focused on the need for better communication and collaboration between the Commission and local government staff to improve the effectiveness and efficiency in the processing of LCP submittals. The reduction in processing times for LCP submittals is the result of the concerted efforts of local government and Commission staff to improve communication and collaboration before LCPs are submitted to the Commission for review. Today most of the issues are resolved before an LCP amendment is submitted to the Commission, which has resulted in fewer suggest modifications and more expeditious processing.

III. STATUS UPDATE

Short-Term Rentals (STRs)

In recent years, California’s growing housing crisis, the rising cost of overnight accommodations along the coast, and the advent of online booking sites for short term rental of private properties has caused local jurisdictions to struggle to balance the provision of overnight accommodations for coastal visitors with local housing needs. In an effort to address these housing needs and other impacts that vacation rentals sometimes have on local communities, some local governments have developed ordinances to regulate or ban the ability of homeowners to rent out their properties on a short-term basis. Generally speaking, the regulation of short-term rentals represents a change in the intensity of use and access to the shoreline, and thus constitutes “development” governed by the Coastal Act.¹⁷ Therefore, in the coastal zone, the regulation of vacation rentals must occur within the context of a local coastal program and/or be authorized pursuant to a coastal development permit.¹⁸

Short-term rentals (STRs) are generally understood to be rentals of a portion of or of an entire housing unit for 30 days or less and can provide overnight accommodations that are often a more affordable option for many travelers, especially groups and families. STRs include a range of options, from sharing rooms in an occupied house to renting a whole apartment or house without the owner present. While STRs have been in use in coastal areas for many decades, recently, the use of online booking sites has greatly expanded their use as an alternative to commercial lodging.

Although STRs can help maximize access to the coast, in some cities and counties—and especially in jurisdictions where STRs are unregulated—vacation rentals may cause a variety of adverse impacts. Depending on their location and the way they are regulated, the Commission has recognized that STRs can cause, for example:

¹⁷ In *Greenfield v. Mandalay Shores Community Association*, (2018) 21 Cal.App.5th 896, a court of appeal overturned a homeowners’ association’s ban on short-term rentals, finding that the ban on such rentals—which used to be common in the area—constituted a change in the intensity of use of homes, and thus was “development” subject to Coastal Act regulation by the city and/or Commission. Although the city of Oxnard’s LCP was silent on the issue of STRs, the court found that a private party such as an HOA could not enact a large-scale ban on STRs without appropriate Coastal Act review. Thus, the new regulation of STRs, including bans, generally represents a change in the intensity of use of and of access to the shoreline which is regulated by the Coastal Act.

¹⁸ For recent guidance on STRs in the coastal zone, see: https://documents.coastal.ca.gov/assets/la/Short_Term_Vacation_Rental_to_Coastal_Planning_&_Devt_Directors_120616.pdf.

- Alteration of community character by introducing lodging into residential neighborhoods;
- Impacts on affordable and workforce housing;
- Parking and transportation congestion impacts;
- Enforcement issues;
- Overburdening of water, sewer and other public utilities and services; and,
- Management issues such as numbers of occupants and overcrowding, noise, trash and special events.

In response to community concern regarding these and other issues, many local coastal governments have prohibited or regulated STRs, or are considering ordinances to do so. The Commission, recognizing the value of STRs to coastal visitors, has encouraged local jurisdictions to address these types of adverse impacts through reasonable and balanced regulations that still allow for STRs in appropriate locations. The Commission has taken the position that ordinances regulating STRs are not in effect in the coastal zone unless approved by the Coastal Commission through a coastal development permit (in areas without a certified LCP) and/or through certification of a LCP Amendment.¹⁹ In its actions, the Commission has certified LCP provisions that provide for an adequate stock of STRs while minimizing impacts to coastal resources and the neighboring community.²⁰

Sea Level Rise Planning and Adaptation

The impacts of sea level rise in California will affect almost every facet of our natural and built environments. Natural flooding, erosion, and storm event patterns are likely to be exacerbated by sea level rise, leading to significant social, environmental, and economic impacts. Through its Sea Level Rise Policy Guidance and ancillary efforts, the Commission supports California's preparation for these critical challenges to ensure a resilient coast for present and future generations. Moreover, the Commission acknowledges that specific planning and adaptation measures must begin at the local level, in partnership with local governments and through the LCP planning process. The Commission seeks to support local governments in planning for resilient development while protecting coastal resources.

In August 2015, the Coastal Commission unanimously adopted its *Sea Level Rise Policy Guidance: Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Permits*.²¹ As interpretive guidelines, the guidance document aimed to assist the Commission, local governments, and members of the public when evaluating how to respond to sea level rise. It also fit into an active state effort to address sea level rise and climate change, and was designed to incorporate, reflect, and complement various statewide guidance and recommendations. Specifically, the guidance document reflected the broad concepts and strategies in *Safeguarding California* – the statewide climate adaptation plan developed by the California Natural Resources Agency – and complemented it by providing information more specific to the Coastal Act. The guidance document was also written to reflect the

¹⁹ The Commission provided direction on regulating STRs in the coastal zone in 2016; see:

https://documents.coastal.ca.gov/assets/la/Short_Term_Vacation_Rental_to_Coastal_Planning_&_Devt_Directors_120616.pdf.

²⁰ For a list of LCP amendment actions related to STRs, see: <https://documents.coastal.ca.gov/assets/la/Commission-STR-LCP-Actions-Table-May-20-2019.pdf>.

²¹ See: <https://documents.coastal.ca.gov/reports/2015/8/w6c-8-2015.pdf>.

recommendations of the Ocean Protection Council’s *State Sea-Level Rise Guidance (2013 Update)*, notably recommending that stakeholders utilize the projections presented in the 2012 National Research Council (NRC) report *Sea-Level Rise for the Coasts of California, Oregon and Washington: Past, Present, and Future*.

However, sea level rise science has continued to evolve, prompting Governor Brown to direct the Ocean Protection Council to synthesize the state of sea level rise science and to update the State Sea-Level Rise Guidance as necessary. As a result, in 2017, a working group of OPC’s Science Advisory team released *Rising Seas in California: An Update on Sea-Level Rise Science*²², which provides a summary of the scientific updates since the 2012 NRC Report, including information contained within the IPCC 5th Assessment Report (2014) as well as recently published research that expands our understanding of ice sheet dynamics. The new findings on sea level rise presented in the Rising Seas report, particularly the probabilistic sea level rise projections and increased understanding of ice sheet dynamics, prompted the update to the State’s sea level rise guidance document. The *State Sea-Level Rise Guidance: 2018 Update*²³ was adopted by the Ocean Protection Council in March 2018, and provides both state agencies and local governments with a science-based methodology to assess sea level rise risks.

As a result, focused updates to the Commission’s 2015 Sea Level Rise Policy Guidance document were developed to incorporate evolving science, up-to-date sea level rise projections tailored to the State of California, and recent statewide guidance.²⁴ Most significantly, new projections that the OPC recommends using when making planning, permitting, investment, and other decisions have been incorporated into the adopted 2018 version.²⁵ Projection tables are included for 12 tide gauges along the California coast, and each table presents projections for every 10 years from 2030 to 2150. OPC has highlighted three specific scenarios that they recommend evaluating based on the type of project and the level of risk associated with the development type (or planning area). These projection scenarios are included in the Commission’s adopted 2018 update, and include:

- *Low risk aversion scenario*: the upper value for the “likely range” (which has approximately a 17% chance of being exceeded); may be used for projects that would have limited consequences or a higher ability to adapt.
- *Medium-high risk aversion scenario*: the 1-in-200 chance (or 0.5% probability of exceedance); should be used for projects with greater consequences and/or a lower ability to adapt.
- *Extreme risk aversion (H++)*: accounts for the extreme ice loss scenario (which does not have an associated probability at this time); should be used for projects with little to no adaptive capacity that would be irreversibly destroyed or significantly costly to repair, and/or would have considerable public health, public safety, or environmental impacts should that level of sea level rise occur.

²² See: <http://www.opc.ca.gov/webmaster/ftp/pdf/docs/rising-seas-in-california-an-update-on-sea-level-rise-science.pdf>.

²³ See: http://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf.

²⁴ For staff report on the science update, see:

https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf.

²⁵ See: https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf.

There are additional ongoing Commission efforts to provide additional technical assistance and support to local governments. In addition to the SLR Guidance that can help inform local planning, Commission staff has continued to provide outreach on the Guidance document to local government entities as well as internal staff for the purposes of strengthening District staff support of SLR issues, including through on-line guidance and resources. In addition to outreach on the 2018 SLR Guidance, the Commission has been working on the following efforts related to SLR:

- **Public Outreach and Communication on SLR:** The Commission has been working in collaboration with the OPC and others on the State SLR Leadership Group (which also includes the Coastal Conservancy, State Lands Commission, State Parks, and the Bay Conservation and Development Commission) to develop a statewide effort related to public outreach on SLR. In addition, the Commission’s SLR Team, Public Information Officer and Public Education Department are working to expand opportunities for such outreach and communication.
- **Draft Adaptation Guidance on Residential Development:** The Commission has been working to revise its Draft Adaptation Guidance on Residential Development²⁶, which will provide accessible information on SLR adaptation and a suite of practical land use policy tools to help facilitate planning for resilient shorelines while protecting coastal resources in LCPs.
- **Coordination with State Lands Commission on Public Trust:** With support from our Federal partner, NOAA, The Commission and the State Lands Commission (SLC) staff are working together to address issues related to sea level rise, the ambulatory boundary of the public trust and implications for public trust resources.
- **New Adaptation Guidance for Critical Infrastructure:** Also with support from our Federal partner, NOAA, the Commission is developing SLR Adaptation Guidance specific to Critical Infrastructure. This Guidance will serve as a companion to the Draft Adaptation Guidance on Residential Development. A draft of the Guidance is scheduled to be released next year.

These efforts illustrate that the Commission recognizes that implementing sea level rise adaptation planning is a challenge for all levels of government. The Commission is committed to continuing technical assistance for local governments undertaking LCP planning wherever feasible.

²⁶ See: <https://documents.coastal.ca.gov/assets/climate/slr/vulnerability/residential/RevisedDraftResidentialAdaptationGuidance.pdf> and <https://www.coastal.ca.gov/climate/slr/vulnerability-adaptation/residential/>.