

**CALIFORNIA COASTAL COMMISSION**

455 MARKET STREET, SUITE 300  
SAN FRANCISCO, CA 94105  
VOICE (415) 904-5200  
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**EXHIBIT 2****F5****COASTAL COMMISSION PUBLIC REVIEW DRAFT****2021 – 2025 STRATEGIC PLAN November 6, 2020****PUBLIC COMMENTS**

1. Comment from Gordon Shumway, dated 12/10/2019
2. Comment from Norman Groot from Monterey County Farm Bureau, dated 12/17/2019
3. Comment from Mr. Geramaldi, dated 12/20/2019
4. Comment from Rick Cole, City Manager, City of Santa Monica, dated 1/13/2020
5. Comment from Taylor Roschen from California Farm Bureau, dated 1/14/2020
6. Comment from Kent Rodricks, dated 1/28/2020
7. Comment from Doug Fiske, dated 1/28/2020
8. Comment from Albert Perdon, dated 1/29/2020
9. Comment from Carol Reynes, dated 1/29/2020
10. Comment from Laura Morgan, dated 1/30/2020
11. Comment from Joseph Barco, Sunset Beach CA LCP committee, dated 1/30/2020
12. Comment from Scott Andrews, dated 2/3/2020
13. Comment from Rich Everett, Everett Family Farm, dated 2/3/2020
14. Comment from Jack Dukati, dated 2/3/2020
15. Comment from Alliance of Coastal Marin Villages, dated 2/6/2020
16. Comment from Donna Clavud, Tomales Design Review Board, dated 2/6/2020
17. Comment from Ralph Faust Ex Parte, dated 2/6/2020

18. Comment from Mary Halley, Muir Beach Community Services District, dated 2/7/2020
19. Comment from Mary Halley, East Shore Planning Group, dated 2/7/2020
20. Comment from Mary Small, State Coastal Conservancy, dated 2/7/2020
21. Comment from Ann Grymes, LCP Committee of East Shore Planning Group, dated 2/8/2020
22. Comment from Hilary Avalon, dated 2/9/2020
23. Comment from Melinda Bell, Dillon Beach Neighborhood Group, dated 2/9/2020
24. Comment from Ralph Faust, dated 2/9/2020
25. Comment from Jennifer Blackman for Jack Seidman, Bolinas Community Public Utility District, dated 2/10/2020
26. Comment from Sally Anne Smith, Mal Paso Creek Property Association, dated 2/11/2020
27. Comment from Jim Heid, Albion Bridge Stewards, dated 2/11/2020
28. Comment from Supervisor Dennis Rodoni, County of Marin Board of Supervisors, dated 2/11/2020
29. Comment from Derek Dolfie, League of California Cities, dated 2/12/2020
30. Comment from Jim Campbell, Deputy Community Development Director, City of Newport Beach, dated 2/12/2020
31. Comment from Marie Hunrichs, dated 2/12/2020
32. Comment from Brian Crawford, Director, County of Marin Community Development Agency Planning Division, dated 2/12/2020
33. Comment from Melvin Nutter on behalf of Amigos de Bolsa Chica, dated 2/12/2020
34. Comment from Maricela Morales, CAUSE, dated 2/13/2020
35. Comment from Scott Williams, Caltrans, dated 2/13/2020
36. Comment from Nicolle Aube, City of Huntington Beach, dated 2/13/2020
37. Comment from Maria Brown, GFNMS, dated 2/13/2020
38. Comment from Carolyn Chase, dated 2/13/2020
39. Comment from Penny Elia, dated 2/14/2020
40. Comment from Shari, dated 2/14/2020
41. Comment from Dr. Jean Spengel, dated 2/14/2020
42. Comment from Kevin Woodhouse, City Manager, City of Pacifica, dated 2/14/2020
43. Comment from Ashley Chen for Gary Matthews UCSD, dated 2/14/2020
44. Comment from Matt Fuller, dated 2/14/2020

45. Comment from Tyler Foltz City of Imperial Beach, dated 2/14/2020
46. Comment from Kathy Parrish, dated 2/14/2020
47. Comment from Peggy Ray, dated 2/14/2020
48. Comment from Jennifer Savage & Susan Jordan, Surfrider, dated 2/14/2020
49. Comment from Sydney Chamberlin & Allyssan Mann, The Nature Conservancy, dated 2/14/2020
50. Comment from Isidro Figueiro, City of Oxnard, dated 2/14/2020
51. Comment from Debra Madden, dated 2/14/2020
52. Comment from Sandra Nobile, dated 2/14/2020
53. Comment from Anna Loew, SANDAG, dated 2/14/2020
54. Comment from Lisa Gordon, Sunroad Enterprises, dated 2/14/2020
55. Comment from Angela Shen, Azul, dated 2/14/2020
56. Comment from Amy Lovid, dated 2/14/2020
57. Comment from Raquel Juarez, dated 2/14/2020
58. Comment from Linda Briggs, dated 2/14/2020
59. Comment from Michael Candra, dated 2/14/2020
60. Comment from Andrea Wogsland, Greenspace dated 2/14/2020
61. Comment from Christine Heinrichs, dated 2/14/2020
62. Comment from Emily Parker Heal the Bay, dated 2/14/2020
63. Comment from Leslie Purcell, dated 2/14/2020
64. Comment from Cheryl Robinson, dated 2/16/2020
65. Comment from Thomas Modica, Acting City Manager, City of Long Beach, dated 2/14/2020
66. Comment from Karsten Mueller, dated 3/6/2020
67. Comment from George Clyde, East Shore Planning Group, dated 3/10/20
68. Comment from Randy Lovell, State Aquaculture Coordinator, CA Dept. of Fish & Wildlife, dated 3/11/20

**From:** [Gordon Shumway](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** 5 year plan  
**Date:** Tuesday, December 10, 2019 8:49:37 AM

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I have reviewed some of the 5 year plan and am struck by the emphasis on "diversity", "social justice" etc. Why not address "short term rentals" and keep to your job instead of the other social issues that are totally none of your business. You have lost your way.

Gordon Shumway





December 17, 2019

California Coastal Commission  
Att: Executive Division  
45 Fremont St., Ste. 2000  
San Francisco, CA 94105

VIA: E-mail to [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

**RE: DRAFT California Coastal Commission Strategic Plan 2020-2025**

Dear Commissioners:

Monterey County Farm Bureau represents family farmers and ranchers in the interest of protecting and promoting agriculture throughout our County. Since 1917, Farm Bureau strives to improve the ability of those engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of our local resources.

Our organization has engaged on several coastal zone issues related to impacts on agricultural land use, policies, and development. Recently, we participated in the Coastal Commission decision process for the slant well permit of the Monterey Peninsula Water Supply Project. Our objective is to maintain agricultural production in coastal zones of Monterey County, as well as support projects that improve water resources and availability.

Our comments on the Strategic Plan draft relate specifically to Objective 3.3 *Protect Coastal Agriculture and Maximize Agriculture Production on Prime Agricultural Lands*.

**Objective 3.3.1** *Update LCP guidance on coastal agriculture to address emerging and core issues such as cannabis operations in the coastal zone, changes in coastal agricultural economies, development pressures, sustainable and modern carbon-neutral agricultural practices, and climate change impacts on coastal farms.*



While this statement sounds generally supportive of farming in the coastal zone areas, it lacks clarity on support for routine and on-going agricultural activities such as field preparation, change of cropping patterns, and water use. Farming practices are consistently changing and updating in the rapidly evolving environment of sustainability and technology; routine operational activities are improving protections for soil health, minimizing the use of agricultural chemicals through integrated pest management practices, and formulating swift reaction to exotic invasive pests and diseases for eradication before becoming endemic. There needs to be clarification of language that states any newly developed on-farm practices that become routine, as part of the production cycle and food safety measures, should be supported and not require additional coastal use permitting. There have been numerous instances in the past where this type of conflict has arisen, particularly when marketing influences cause changes in cropping patterns. Additional language supporting routine farming practices will provide needed certainty to coastal agricultural operations.

Monterey County mandates that cannabis production be maintained in greenhouses only; therefore, in the coastal zone, policies on cannabis production should include greenhouse structures as part of routine agricultural production practices. Local building permits and land use plans are sufficient to manage these structures as proposed and constructed. Currently, Monterey County has no prohibition on cannabis operations in the coastal zone.

**Objective 3.3.2** *Further explore agricultural land protection approaches and mechanisms that may be facilitated through Commission planning and regulatory actions.*

This statement should be interpreted to include collaboration with other state agencies that regulate agricultural practices, such as Department of Pesticide Regulation and Regional Water Quality Control Boards. To avoid potential conflicts with other regulatory agency policies, consultation should be undertaken before implementing any new policies that impacts coastal zone farming land use or production practices. It is much appreciated that the Commission plans to protect coastal zone agricultural land use but this should not place modified or future policies at odds with other regulatory agencies, nor duplicate existing regulations with additional requirements and compliance reporting.

**Objective 3.3.3** *Outreach to coastal agricultural communities to promote information sharing on key agricultural issues through guidance documents, webinars, and/or workshops.*

Monterey County Farm Bureau welcomes outreach by the Commission on topical issues related to agricultural production in the coastal zone areas of Monterey County (and the Central Coast





region). Given the highly-intensive cropping patterns here, it is critical that open and consistent communication is offered to the agricultural community; our organization is willing to assist in organizing outreach workshops for local growers, harvesters, and processors. With most of the coastal zone farm production areas of Monterey County engaged in fresh vegetable, leafy greens, and berry crop production, there is substantial need for this type of information to be disseminated in a timely manner; crop schedules are planned many years in advance of planting. Ideally, workshops should be locally sited and documents that need to be distributed to the agricultural sector can be done so through our organization.

We thank the Commission for allowing comments on the Strategic Plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Norman C. Groot'.

Norman C. Groot  
Executive Director

From:

Mr. Geramaldi

Friday, December 20, 2019

The following are my comments to the *Public Review Draft California Coastal Commission Strategic Plan 2020-2025*, that was made available to the public.

My comments are based on the PDF document dated December 6, 2019.

It is my understanding that my comments must be received by February 14, 2020.

I would first like to thank you for the opportunity to comment on the draft document. I am an avid visitor and very much enjoy of the California coast. My life has always been close to the ocean, deeply appreciating its beauty, while constantly trying to understand its complexity. It is my hope that other will that the effort to learn more about the California coast and how influential it has been to many lives.

Below are my comments pertaining to the draft document:

Page 8: In your core values for Science/Objectivity, I can not help but feel that your statement is too generic, as if I could find this statement in any company/organization profile. I believe that any scientific analysis must result in consistent results and I hope that the CCC's evaluations will lead to definable determinations that would be understandable for all stakeholders and not just to the CCC.

For Objective 2.1 and 2.2, does your definition of public accessways/access include roadways/highways/freeways? I would like for CCC to consider roadways/highways/freeways equally as any other form of public accessway/access, as many California resident rely on them to reach the coast line.

Would the CCC consider closing public access that require costly maintenance or have the potential to injure users? I feel that Human safety is important and should be protected from unsafe conditions. I think locations that require costly maintenance should be reconsidered and perhaps closed to protect the public and reduce tax-payer's cost.

I understand that access related facilities are an important component for coastal access, but I think their locations should be appropriate for the area. I would like for CCC to avoid placing restrooms and waste management along highways/roadways as I anticipate their presence can be abused by the transient population, which could potentially dissuade public use and result in increased litter on our roads and coastal resources.

For Objective 2.5, would the California Coastal Trail (CCT) result in disturbance to previously undisturbed coastal resources? I would prefer to keep undisturbed coastal resources undisturbed when ever possible, but understand the need for access. I am concerned that

opening up previously inaccessible areas may result in unintended disturbances that may not have been predicted. For overall Public Access, I would prefer if the CCC focus on developing coastal access in areas that are already developed (communities, towns, cities, etc.) while focusing on coastal resource protection in rural areas. I suggest that the CCC investigate the possibility of establishing the CCT at locations where there are existing railroad routes. I believe this would be a sensible plan for the CCT as much of the existing railroad lines are along the coast.

For Objective 3.1, would the development of the coastal habitat compendium include habitat characterization identified by the California Department of Fish and Wildlife or by the U.S. Fish and Wildlife Service or by the National Marine Fisheries Service. I think it would be best for the CCC to incorporate habitat criteria identified by other agencies to improve coordination, simplify consistency and increase the probability of success for habitat protection/restoration.

For Objective 4.4, I would prefer if protection of coastal resources from Sea Level Rise (SLR) does not involve high levels/concentration/cost of development. I understand that SLR can threaten the public and public facilities, but I think it is more important to adjust to nature without drastically damaging them. I would like to keep public access open, but not at the expense of highly engineer projects that will no doubt lead to disturbances to our coastal resources. I think natural coastal resources that have the potential to be affected by SLR should be left alone as it is part of the natural process for natural features to undergo changes.

For Objective 5.2, I would like to suggest placing meeting at locations that are further inland, as I believe that inland residents who are passionate about the coast have valuable opinions and insight as much as residents who live near the coast.

For Objective 5.3, I would like to see more programs reach the communities that are located inland as I believe they have the potential to gain the most benefit from coastal resources.

For Objective 6.3, I wholly support better forms/applications for the CDP process. I believe it would be in CCC best interest to provide at minimum three separate CDP process/applications that would address, commercial development, public development and maintenance exceptions. I think it is challenging for those applying and those reviewing a single CDP application that could be applied for a multitude of projects that varies in range and complexity.

For Objective 9 in general, I wholly support making CCC information and resources publicly accessible. I believe that the best decisions are made when the necessary information is available, and I encourage CCC to share their analysis, findings, data and determination with the public so that we can make the best decision for our coastal resources.



Office of the City Manager  
1685 Main Street, Suite 209  
PO Box 2200  
Santa Monica, CA 90407-2200

January 8, 2020

Jack Ainsworth  
California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**RE: Draft CCC Strategic Plan 2020-2025**

Dear Jack,

Thank you and your staff for the thoughtful planning that has gone into this five-year plan to protect and enhance California's coast. The City of Santa Monica has always supported the mission of maintaining our beaches for the benefit of all, protecting the shoreline while hosting 17 million visitors every year.

Our City Council adopted a comprehensive update of our Local Coastal Program Land Use Plan in October 2018, submitting it for certification the following month. We look forward to the certification hearing in February 2020. Our LUP includes goals and policies for addressing anticipated sea level rise, providing public access and recreational opportunities, and protecting the coastal environment. These policies largely mirror the City's longstanding policies that have led to implementation of numerous projects that have improved the quality of our beach by nearly eliminating the urban runoff that was regularly polluting the ocean. The City has also strategically implemented multi-modal mobility policies over the last decade, reinventing our roadway networks to accommodate a range of active transportation options, public transit, and private automobiles.

Shifting Access Focus to Multi-modal

Santa Monica supports the Draft Vision's commitment to coastal stewardship and sustainable development, "**concentrating new growth in existing urban areas, providing multi-modal public access and transportation, and promoting well-adapted, resilient communities in the face of global climate change**." As we see it, this part of the Vision is tailor-made for the approach taken in Santa Monica's pending LUP, which we have coordinated with your staff over the last four years.

We commend draft Policy 2.3.1:

*Work with agency partners, local governments and others to support efforts to bring more people to the coast, including through improved public transit and multi-modal transportation opportunities/*



and draft Policy 4.5.4:

*Work with Caltrans and local governments to integrate multi-modal transportation opportunities in transportation projects to reduce vehicle miles travelled, energy consumption and greenhouse gases.*

Both of these policies reflect that the antiquated association of "Parking=Access" is long overdue for an overhaul, in favor of encouraging more public transportation for beach visitors, especially in urban areas. Indeed, improving the safety and reliability of active transportation options and public transit to visit the beach is the only sustainable access approach that will maintain coastal areas for enjoyment and reduce the emission of GHGs into our impaired atmosphere.

While draft Policies 2.2.3 and 2.2.4 reference working with local governments to maintain parking, even in the event of potential loss due to sea level rise, we hope we understand correctly that the overall emphasis of this five-year strategic plan is to move away from the parking paradigm in urban areas like Santa Monica. We support this welcome change, which will allow us all to keep our focus on the real issues of coastal stewardship and sustainability that should be at the heart of all coastal development review.

#### Staffing and Process Updating

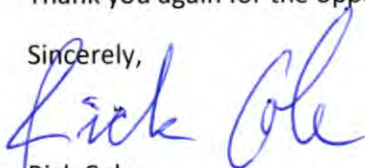
We would also like to lend our support to the conclusions reached in regard to the CCC's staffing and processing. Until Santa Monica receives certification on a comprehensive LCP, including the Implementation Plan now being developed, every coastal development permit and waiver in Santa Monica's coastal zone requires review by your Long Beach staff. While CCC staff is comprised of knowledgeable and helpful professionals, they cannot cope with the workload expected of them. Santa Monica automatically grant our applicants in the coastal zone an extra permit extension of six months in anticipation of lengthy delay. As the State encourages streamlining of housing approvals, the CDP becomes a greater obstacle to providing for our community.

The CCC is also one of the few agencies we have experienced recently that has not integrated digital processes or begun to accept emailed submittal of forms such as grant reports and application materials. The requirement to receive information like this via US Postal Service in order to accept and deem complete also factors into the processing delay.

In summary, we hope you will strive toward building up an appropriate staffing level over the next five years and support your staff to update their processes for the 21<sup>st</sup> century.

Thank you again for the opportunity to comment on this five-year strategic plan.

Sincerely,



Rick Cole  
City Manager



# CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

1127-11TH STREET, SUITE 626, SACRAMENTO, CA 95814 · PHONE (916) 446-4647

January 14, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

RE: Draft 2020-2025 Strategic Plan

Dear Chair Padilla:

On behalf of the California Farm Bureau Federation (Farm Bureau), we appreciate the opportunity to provide comments on the California Coastal Commission's (Commission's) 2020-2025 Draft Strategic Plan. Farm Bureau is a non-governmental, non-profit, voluntary organization representing nearly 40,000 members, many of them from California's coastal counties, who strive to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

Since its creation in 1972, the Commission and Farm Bureau have shared a common goal: to ensure the orderly development and wise use of priority resources within the coastal zone. This mutually-beneficial mission protects coastal farms and ranches from pressure to convert high-priority agricultural land and maintains California's robust coastal agricultural communities, unrivaled in their capabilities to cultivate products that can't be grown elsewhere.

With the immediacy to address California's housing shortage and the impacts of sea level rise, among other things, we recognize an agriculturally-centric goal may not be top of mind. However, we believe that agriculture is a part of the solution—agricultural land protection encourages planned in-fill developments and avoids sprawl, our lands inherently sequester carbon, and provide healthy, local and affordable foods to all of California. Unfortunately, however, we are also often the first impacted by coastal woes—salinity, flooding, erosion—and we require the Commission's assistance to address for these issues. Considering this, we very much appreciate the recognition with the draft Strategic Plan that protecting agricultural production and lands in the coastal zone is a feature in the Commission's important work to date and in the future. Specifically, we praise the inclusion of *Objective 3.3.3*. and the Commission's commitment to conduct outreach to the agricultural community to address key issues to our industry.

In pursuit of these objectives, please consider the Farm Bureau, and our coastal County Farm Bureaus, as facilitators for these grassroots discussions amongst our membership. We hope to continue to serve as an ally in protection of our coastal agricultural resources. Thank you for the opportunity to share our perspective. If you have questions or comments, please feel free to reach out to me at [troschen@cbbf.com](mailto:troschen@cbbf.com) or 916-446-4647 or to any coastal County Farm Bureau, directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Roschen'.

Taylor Roschen  
Director of Land Use and Commodities



**From:** [kent rodricks](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Disabled accessibility at beaches  
**Date:** Tuesday, January 28, 2020 2:47:19 PM

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To whom it may concern:

An abundance of disabled parking spaces is mandatory at all California beaches.

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Kent Rodricks  
760.550.2500  
@kentrodricks

Sent from iPhone XS Max

**From:** [Doug Fiske](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** My Input  
**Date:** Tuesday, January 28, 2020 3:36:06 PM

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Since the San Diego staff reversed its late July 2018 position and recommendation regarding the Leucadia 101 Streetscape project — that position was correct and lawful — and in late September recommended approval, which the commission then followed in October — that was wrong and in violation of the Coastal Act of 1976 — I have lost faith in the honesty and integrity of the commission.

Two commissioners and several residents had filed appeals. They were ignored. The commission made its decision behind closed doors during a break in the meeting.

The staff and commission yielded to what influence I don't know. Both became corrupt.

Doug Fiske  
Encinitas

**From:** [albertperdon](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Input to 2020 - 2025 Strategic Plan  
**Date:** Wednesday, January 29, 2020 1:24:09 PM

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Thank you for the opportunity to offer my comments on the draft Plan.

Albert Perdon

De Luz, San Diego County, CA 92028

310.871.1113

Comments:

You need to better define and distinguish the coastal resources that lie within the geographic boundaries and public interests under the purview of the California Coastal Commission, distinguishing the differing but related boundaries and interests in:

1. The coastal waters and ocean creatures
2. The coastal land, people, other animals, plant life and infrastructure

Your goals should be to:

1. Protect the coastal waters to maintain a clean, unpolluted environment where people and ocean creatures are able to survive and prosper, while using the coastal resources to the benefit of people and the land resources in a way that does little or no harm to the coastal waters and its resources. (Drilling oil wells in the coastal waters does not count as an acceptable use of coastal waters due the environmental risks of such drilling, but swimming or surfing in the waters and sustainable fishing, for example, are ok.)
2. Maximize the public's desirable use of and access to the coastal waters and the adjoining land areas for the benefit of the people, by ensuring the infrastructure and services required are made, or are enabled to be made, available in a way that protects the public interest in the enjoyment of the ocean and land environment. (Land use regulations that limit human population within walking distance of the ocean is not acceptable, but housing and other physical infrastructure such as transit systems and related means that enable high-density land uses to maximize public access to the coast is ok.)

Your objectives should be:

1. Defined and measurable, and based upon realistic expectations for achieving the desired results within an established time frame, and verified to be financially feasible, with committed funding resources in place. (Securing funding commitments is not acceptable, but securing a defined amount of funding within a defined time frame is ok. Working with somebody is not ok, but securing specified and appropriately-defined land use and zoning regulation agreements within a defined time-frame is ok. An agreement that enables high-density housing and related infrastructure to accommodate a 300% increase in population within walk access of coastal waters within the next 20 years, funded by existing funding sources and new benefit assessment funding mechanisms is ok.)
2. Focused on and defined as real objectives and not on strategies or as hoped-for aspirations. (Increasing auto-free public access to coastal waters by 300% within the next 10 years at an estimated public cost of \$1 billion in established highway funding sources is ok. Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast, is not an objective because it is not measurable – as in how many barriers, over what time span and at what cost and funding source; it is a strategy. Working with agency partners, local governments and others to support efforts to bring more people to the coast, including through improved public transit and multi-modal transportation opportunities is a strategy. Distinguish an objective from a strategy. If your objective is to have 10 working meetings with various

people over 12 months at a cost of \$500,000 in taxpayer funding in order to prepare a report on the meetings held, then that would qualify for being an objective. But, it would probably not be a good objective.)

Your strategies should be:

1. Focused on those that maximize bottom-up, versus top-down, decision-making. (That is to say, the Commission should leave the details to the local officials closest to the people directly impacted and accountable for the decisions made. Commissioners and Commission staff don't need to decide if the awnings on a proposed new restaurant building should be blue or orange. Neither do you need to determine if a restaurant should be or should not be built. That's a decision that's best left with local city officials.)
2. Aimed at enabling and facilitating, not prescribing, the means for achieving the desired broad objectives. (You should be an overseer that establishes the broad goals and objectives and then monitors to ensure the objectives are being met, or to determine what actions need to be taken to reset the goals or objectives. You should ask, how we can help the local agencies achieve the Commission's objectives. You should avoid trying to take the authority and responsibility away from the local cities. Decide if you want a 10% increase in walk access to the beach or a 300% increase. Decide the strategy you will use to support the local cities to achieve that objective. Don't confuse objectives and strategies with aspirations. We aspire to "expand the California Coastal Trail (CCT) System". Our objective is to double the length of the CCT system over the next 20 years at an estimated cost of \$3 billion in public and private costs funded from existing carbon tax funding sources and 50% matching funds from infomercial advertising revenues.)

**From:** [Carol Reynes](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Venice Development - Just say NO!  
**Date:** Wednesday, January 29, 2020 2:11:36 PM

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To Whom It Concerns,

Please, please, protect our lovely coast and beaches and do NOT fast-track or EXEMPT new developments from the Coastal Commissions guidelines and studies.

This committee exists to protect our coastline and delicate environment, not to serve the special interests of developers, activists, and government officials. You only have one shot at getting this right and if you greenlight any projects despite their negative impact to our environment, that will be on you, the very organization that is supposed to protect it.

Best regards,

Carol Reynes  
26 Year Venice Resident

**From:** [Laura Morgan](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Realistic goals for public access based on carrying capacity  
**Date:** Thursday, January 30, 2020 4:37:24 AM

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Dear California Coastal Commissioners,

I am writing to express my concerns as an individual involved in Sonoma County's Local Coastal Plan update. The ambitious public access goals expressed in the Commission's strategic plan seem out of step with the observed consequences of increased visitation to our county.

We lack water resources and physical space to serve more low-cost visitor accommodation. 53% of our coastal zone housing is vacation rental, which limits housing for local workers, mitigates against a stable population of voters and has resulted in unprecedented instances of nuisance and criminal behavior by irresponsible renters. Our roads are brought to a standstill by weekend traffic through small communities such as Bodega Bay. We have issues of defacement of natural resources such as entrepreneurial chipping off and selling of pieces of Mammoth Rubbing Rocks at Sonoma Coast State Park. Off-trail hikers are causing heightened erosion in physically fragile, sensitive habitat areas. Dudleya and other fragile native coastal plants are poached. Trash is left on our beaches regularly by either unaware or uncaring day-trippers.

Education regarding proper etiquette for coastal zone visitors is extremely important but perhaps unrealistic in its desired outcome, given the sheer numbers of visitors involved.

Our emergency services are stretched to the breaking point by hordes of unwary visitors who are swept into the sea, fall from cliffs or have other medical events requiring attention. The lion's share of county income generated by transient occupancy taxes in the unincorporated lands of the coastal zone not is being returned in the form of sorely needed infrastructure support but diverted to more pressing county emergencies such as fire, flood and homeless relief, leaving small coastal communities' local roads and other infrastructure derelict.

When the Coastal Act was passed, there was a lower visitation population and no operative awareness of climate change. These two factors now create a huge tension for coastal conservation. I urge the Commission to think outside the 48 year-old box of the Coastal Act's original mission in order to update and shift its priorities toward better natural resource management rather than maximization of public access.

Thank you for this opportunity to comment.

Laura Morgan  
2821 Dyer Ave  
Sebastopol, CA  
95472

**From:** [Joseph Barco](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Cc:** [josephbarco@gmail.com](mailto:josephbarco@gmail.com)  
**Subject:** Public Comments  
**Date:** Thursday, January 30, 2020 11:41:53 AM

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Very detailed with lots of initiatives. This is going to take a lot of effort to complete and leadership to guide the staff in the right direction.

- One item I do not see in the 2020-2025 Strategic Plan is a way of measuring progress on the various initiatives.
- Another is prioritizing initiatives. Some are more important than others relative to time.
- The issues of training and retaining staff is more of an organization issues and should be a stand along item. Very important and it could be outlined in a more direct manner. You need staff to carry out the objectives of the CCC. It is important to the public that issues/initiatives be carried out in a timely manner, without qualified staff it will not be done.

Thank you,

Joseph Barco  
member in the Sunset Beach, CA LCP Committee

**From:** [Scott](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Comments Strategic Plan  
**Date:** Monday, February 03, 2020 10:37:13 AM

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Dear Commission,

Perhaps an unintended consequence of Sacramento's infill development is the privatization of beach tideland access.

Now, prior to infill, beach parking is in major deficit, with lack of spaces for coast goers to pull into out of gridlocked traffic.

Recently, commissioners voted to deny new units in Pacific Beach any parking spaces. PB requires coastal access

parking for fully four [4] major area recreational attractions - the beach, Mission Bay Park, the Mission Beach Boardwalk that

extends to PB, and Belmont Park in the south end.

It is important to remember that high income beach residents can garage their vehicles. If the commission does not

require concurrent parking mitigation when cities privatize public parcels like abandoned school sites, building infill luxury

condos in lieu of needed beach parking, the coast becomes enclaves for the rich property owners or resort visitors.

Scott Andrews



**From:** [Rich Everett](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Input on Strategic Plan requested  
**Date:** Monday, February 03, 2020 6:59:29 PM

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To whom it may concern:

I'm an avid environmentalist and protector of the ocean and land. I have been involved with the ocean via fishing and sailing all my life. I was also the past President of West Marine, the largest boating company in the world headquartered in California in which we successfully worked hard to protect our oceans and fishing grounds for all sides. We currently have an organic farm near the ocean in Soquel, Ca. I only mention this to give you an idea from where I am basing my comments, one from an experienced waterman, land owner, and concerned Californian.

The Coastal Commission has gotten off the rails, intruding to much into private property rights, restricting remodels and growth when it does not make sense, while trying to assure public access into private lands with no plans to control the public, putting the environment including the sea-life and beaches at risk. The state of California does not have the expertise, money, nor will to protect the coast like many of the guidelines and laws put in place by the commission.

Get back to common sense management of our coastline that can work and be functional for both the public and the private sectors. Above all, do not mingle in the private lands, most of the time these landowners are better guardians of the coastline than the state. Proof is what's going on with our public access beaches today!

Rich Everett

Everett Family Farm  
Soquel Cider

"Fine Organics From Seed to Core"

PO Box 308  
Soquel, Ca. 95073  
831 566 0472  
[EverettFamilyFarm@gmail.com](mailto:EverettFamilyFarm@gmail.com)

**From:** [Jack Dukati](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Please help us -- 4th Avenue / Sunset and Rose in Venice  
**Date:** Monday, February 03, 2020 10:24:38 PM

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We are in trouble and desperately need help - drugs and violence outside our home. Venice has never been Manhattan Beach or the Palisades but it became safer over time. I've lived here for 20 years and I've supported environmental and public safety efforts the entire time. I hope you share my absolute horror at seeing a neighborhood with elderly and strollers and working families get taken over by drugs, rats and mentally disturbed individuals screaming the N-word or worse at passers-by. The major issue is this: LA cleans up 3rd avenue but not the surrounding streets. The emboldened transient vagrant population has simply moved to nearby residential streets to avoid the clean-up -- including 4th avenue. This is a street with families and wheelchaired-citizens who pay taxes and vote. Please please please please help us. I know you are honorable and I see you stand up to Trump. Please stand up for us. Please help us before our children are hurt. This is a solved problem in other cities. Drug addicts and sex offenders should not be able to camp outside of schools and homes with children -- the 9th circuit does not cover a simple response like that. PLEASE HELP US. I am begging because I am afraid and I see the sidewalks taken over and the violence creeping to the surface. We are in danger.

# Alliance of Coastal Marin Villages

*Bolinas, Dillon Beach, Inverness, Inverness Park, Marshall, Muir Beach, Olema,  
Point Reyes Station, Stinson Beach, Tomales*

February 6, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

By email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

Re: Comments on the Public Review Draft California Coastal Commission Strategic Plan 2020-2025.

Dear California Coastal Commission, Executive Division:

The Alliance of Coastal Marin Villages (“ACMV”) consists of representatives of all the villages located in unincorporated West Marin County that are in the Coastal Zone: Bolinas, Dillon Beach, Inverness, Inverness Park, Marshall, Muir Beach, Olema, Point Reyes Station, Stinson Beach and Tomales. The ACMV formed as a result of meetings convened by California State Senator Mike McGuire to assess the impacts of (and formulate solutions to) the problems posed by increased tourism to West Marin, which has strained local resources and degraded the coastal visitation experience. The ACMV meets regularly to discuss and address issues of common concern, and on a quarterly basis with Marin County Supervisor Dennis Rodoni.

We write today to urge the California Coastal Commission (“CCC”) and its staff to correct an omission in the draft Strategic Plan for 2020 – 2025 (version 12/6/19). The Strategic Plan should include a Goal and several Objectives in accordance with the statutory direction of PRC §30253(e):

*§30253 New development shall do all of the following:*

... .

*(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.*

As stated in Marin County’s Local Coastal Plan with respect to PRC§ 30253: “[t]he intent of this policy is to protect the unique character of existing coastal communities.” Almost all of our villages are special communities that, because of their unique characteristics, are popular visitor destinations. Like similar small villages up and down the California coast, these villages are suffering the consequences of substantially increased numbers of coastal visitors — numbers far greater than when the Coastal Act became law.<sup>1</sup> The villages need protection and relief from the effects of increasing numbers of recreational visitors. The villages face significant financial and logistical challenges to providing services to the additional visitors while at the same time protecting the coastal environment and maintaining their community character. Indeed, it is the very special character of these villages that makes them such popular visitor destinations in the first place.

Increasing tourism to our communities has these impacts: excessive trash; stress on local water and sanitation systems; the need for more public bathrooms; traffic congestion; traffic-related threats to public safety; noise and disturbance of fragile local ecosystems; and parking challenges for visitors and locals alike. Addressing

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<sup>1</sup> The impacts of increased tourism to our area caused the Marin County Board of Supervisors to underwrite a study, AECOM, “West Marin Visitor Needs Assessment” (May 2017), which predicted substantial growth in visitor numbers in the years ahead. Senator Mike McGuire hosted overflow meetings on the subject in Point Reyes Station in 2017 and 2019.

these impacts often exceeds the capacity of existing infrastructure and local financial resources. As directed by the Coastal Act, the CCC needs to balance the laudable goal of preserving public access against these impacts to ensure there is reasonable management of public access, financial resources for impacted communities to retain their special character, and attention to these consequences in connection with new development and other CCC policies.

Thus, in accordance with Coastal Act Section 30253(e), we ask that an additional Objective be added to the Draft Strategic Plan, “Coastal Resources – Goal 3 -- Protect and Enhance Coastal Resources”:

**Objective 3.x Protect the Unique Character of Special Communities and Neighborhoods.**

3.x.1 Update LCP guidance on protection of special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

3.x.2 Encourage sensible management solutions and sources of financial support where increased coastal tourism threatens environmental resources, the character of coastal communities, the financial ability of local agencies to serve tourist needs, and/or the visitor experience.

3.x.3 Outreach to coastal communities to promote information-sharing on key issues relating to the management of increasing tourism through guidance documents, webinars, and/or workshops.

Like the protections of Objective 3.3 for agriculture (which served as a model for this proposed objective), including this Objective in the Strategic Plan 2020-2025 would ensure that the CCC and its staff will not fail to address the important protections for coastal communities granted under the Coastal Act.

These protections are of such importance to our villages and others along the California coast that they should also be mentioned in the Vision Statement. We propose this addition:

**Our Vision:**

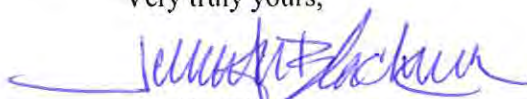
The California coast is available for all to enjoy through thousands of public accessways to and along the shoreline, a completed California Coastal Trail, a well-supported network of parks and open spaces, and a wide range of visitor-serving facilities, including lower-cost campgrounds, hostels, and hotels. The rich ecological diversity of the coast and ocean, including beaches, rocky shorelines, wetlands, riparian areas, and sensitive terrestrial habitats, is protected and thriving. Scenic rural landscapes are maintained, coastal agriculture is flourishing, the unique characteristics of the special communities and neighborhoods that attract coastal visitors are preserved, and cultural resources are protected. The California Coastal Commission works collaboratively with local governments, other agencies, and an engaged and knowledgeable public committed to coastal stewardship to support and manage environmentally-sustainable development, including assuring priority for coastal-dependent and related uses of land and water, concentrating new growth in existing urban areas, providing multi-modal public access and transportation, and promoting well-adapted, resilient communities in the face of global climate change. The coast endures as a vital part of California’s social and cultural fabric and the coastal and ocean economy is strong.



Letter to California Coastal Commission, Executive Division  
February 6, 2020  
Page Three

In closing, the members of the ACMV believe that the failure of the Draft Strategic Plan to specifically include an objective to preserve the special character of coastal communities and neighborhoods is an omission that needs to be corrected, and we respectfully request that the Commission and CCC staff revise the Draft Strategic Plan accordingly. Please contact me with any questions or if you would like more information about the ACMV. Thank you very much for this opportunity to comment on the Draft Strategic Plan.

Very truly yours,



Jennifer Blackman  
Chair, Alliance of Coastal Marin Villages

cc: Supervisor Dennis Rodoni, Marin County Board of Supervisors, District 4, [drodoni@marincounty.org](mailto:drodoni@marincounty.org)  
Senator Mike McGuire, California State Senate, District 2, [senator.mcguire@senate.ca.gov](mailto:senator.mcguire@senate.ca.gov)  
Assemblymember Marc Levine, California State Assembly, District 10, [assemblymember.levine@assembly.ca.gov](mailto:assemblymember.levine@assembly.ca.gov)  
Steve Padilla, Chair, California Coastal Commission, [Stephen.Padilla@coastal.ca.gov](mailto:Stephen.Padilla@coastal.ca.gov)  
Donne Brownsey, Vice Chair, California Coastal Commission, [Donne.Brownsey@coastal.ca.gov](mailto:Donne.Brownsey@coastal.ca.gov)  
Sara Aminzadeh, Commissioner, California Coastal Commission, [Sara.Aminzadeh@coastal.ca.gov](mailto:Sara.Aminzadeh@coastal.ca.gov)  
Dayna Bochco, Commissioner, California Coastal Commission, [Dayna.Bochco@coastal.ca.gov](mailto:Dayna.Bochco@coastal.ca.gov)  
Linda Escalante, Commissioner, California Coastal Commission, [Linda.Escalante@coastal.ca.gov](mailto:Linda.Escalante@coastal.ca.gov)  
Carole Groom, Commissioner, California Coastal Commission, [Carole.Groom@coastal.ca.gov](mailto:Carole.Groom@coastal.ca.gov)  
Dr. Caryl Hart, Commissioner, California Coastal Commission, [Caryl.Hart@coastal.ca.gov](mailto:Caryl.Hart@coastal.ca.gov)  
Erik Howell, Commissioner, California Coastal Commission, [Erik.Howell@coastal.ca.gov](mailto:Erik.Howell@coastal.ca.gov)  
Katie Rice, Commissioner, California Coastal Commission, [Katie.Rice@coastal.ca.gov](mailto:Katie.Rice@coastal.ca.gov)  
Effie Turnbull-Sanders, Commissioner, California Coastal Commission, [Effie.Turnball-Sanders@coastal.ca.gov](mailto:Effie.Turnball-Sanders@coastal.ca.gov)  
Roberto Uranga, Commissioner, California Coastal Commission, [Roberto.Uranga@coastal.ca.gov](mailto:Roberto.Uranga@coastal.ca.gov)  
Mike Wilson, Commissioner, California Coastal Commission, [Mike.Wilson@coastal.ca.gov](mailto:Mike.Wilson@coastal.ca.gov)

February 6, 2020

California Coastal Commission

Executive Division

45 Fremont Street, Suite 2000

San Francisco, CA 94105

By email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

RE: Comments on the Public Review Draft California Coastal Commission Strategic Plan 2020-2025

Dear California Coastal Commission Executive Division:

On behalf of Tomales Design Review Board, I am writing to support the comments sent to you by the Alliance of Coastal Marin Villages regarding the Draft Strategic Plan.

We support the statutory direction of PRC 30253 (e) whose intent is to protect the unique character of existing cultural communities.

We urge you to amend your Draft to add an additional objective to Coastal Resources-Goal 3-Protect and Enhance Coastal Resources to include: Protect the Unique Character of Special Communities and Neighborhoods.

We are confident that this amendment will address the important protections for coastal communities granted under the California Coastal Act.

Sincerely,

Donna Clavaud

Chairperson

Tomales Design Review Board

PO Box 41

Tomales, CA 94971

**From:** Ralph Faust <[ralph.faust@gmail.com](mailto:ralph.faust@gmail.com)>

**Sent:** Thursday, February 6, 2020 3:19 PM

**To:** Wilson, Mike

**Subject:** Effective Public Participation and the Commission's Strategic Plan

**RECEIVED**  
FEB 06 2020

Hi Mike:

Thanks for the opportunity to speak with you again regarding the Coastal Commission Transparency, Accountability and Public Participation project. I want to reiterate that I think that this project should be a part of the Commission's Strategic Plan. Although some elements of the recommendations of that project are included in the plan, such as Objectives 5.2.5, 9.3, 9.4 and 9.5, neither all of the recommendations of the Project, nor a comprehensive review of the Commission hearing process itself are called out in the Draft Strategic Plan.

In addition, even the recommendations that are included in the Plan are not called out for prioritization or any specific action. The Commission staff states in the Draft that "At current staffing levels, proactive policy efforts must be relegated to the time available after necessary regulatory and federal consistency work is completed". In the context of those concerns regarding available staff resources, even the recommendations that have been included in the Draft Plan are not likely to be completed unless the Commission specifically directs the Staff to do so. These improvements to the public process to make public participation more effective are too important to be relegated to the time available.

Therefore, as part of the Strategic Plan process the Commission should direct the Staff to:

- Conduct a complete public review of the Commission's information gathering and hearing processes as part of its efforts to promote transparency and accountability in those processes by improving public participation;
- In particular, add a specific objective to change the Commission's procedures to "close the public record for written submissions and ex parte communications sufficiently in advance of the public hearing to allow all participants the opportunity to understand, evaluate and respond to all record evidence at the hearing."
- Prioritize the completion of Objectives 5.2.5, 9.3, 9.4 and 9.5, as well as of the other Objectives identified in the public review process to ensure that they result in actions by the Commission.

Thanks again for the opportunity to chat regarding this important project.

Regards,

Ralph



# **MUIR BEACH COMMUNITY SERVICES DISTRICT**

19 Seacape Drive • Muir Beach, CA 94965 • 415-388-7804 • [www.muirbeachcsd.com](http://www.muirbeachcsd.com)



February 7, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

By email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

Re: Comments on the Public Review Draft California Coastal Commission Strategic Plan 2020-2025.

Dear California Coastal Commission, Executive Division:

I write on behalf of the Muir Beach Community Services District (MBCSD). Muir Beach is a coastal village located at the gateway of both the Muir Woods National Monument and the NPS Muir Beach Park and is also surrounded by the Golden Gate National Recreation Area. The MBCSD is a California Community Services District which provides public services to the community of Muir Beach including; water supply, fire protection, road maintenance for our district roads, and a recreational park which includes hiking trails and a community center. We are a member of the Alliance of Coastal Marin Villages, which has recently submitted comments on the Draft California Coastal Commissions Strategic Plan 2020-2025. A copy of those comments is attached below.

MBCSD strongly supports the comments of the Alliance of Coastal Marin Villages and hereby urges the Commission and Commission Staff to modify the Strategic Plan accordingly with the following objective, *to protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses, as mandated in §30253(e) of the Coastal Act.*

Thus, in accordance with Coastal Act Section 30253(e), we ask that an additional Objective be added to “Coastal Resources – Goal 3 – Protect and Enhance Coastal Resources”:

**Objective 3.x Protect the Unique Character of Special Communities and Neighborhoods.**

- 3.x.1 Update LCP guidance on protection of special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.
- 3.x.2 Encourage sensible management solutions and sources of financial support where increased coastal tourism threatens environmental resources, the character of coastal communities, the financial ability of local agencies to serve tourist needs, and/or the visitor experience.
- 3.x.3 Outreach to coastal communities to promote information sharing on key issues relating to the management of increasing tourism through guidance documents, webinars, and/or workshops.



Also, these issues are of such importance to our villages and others along the California Coast that they should also be mentioned in the Vision Statement. We propose this addition to the Vision Statement:

“Scenic rural landscapes are maintained, coastal agriculture is flourishing, the unique characteristics of the special communities and neighborhoods that attract coastal visitors are preserved, and cultural resources are protected.”

Visitors have always delighted in visiting the coastal towns and villages and now the popularity of this activity has only increased since the advent of social media. Historic visitors’ interest and focus has continued to be on the coastal village experience for which §30253(e) was enacted to protect. But, with the increase in day-use and overnight visitors, comes the additional burden they put on existing water conservation efforts and supplies, trash collection and shoreline cleanup, finite septic capacities, parking limitations, traffic congestion, emergency services, and public safety.


The Coastal Commission needs to interpret the Coastal Act as the balanced document and ideal vision for which it was created, giving equal consideration to those parts of the Coastal Act that support public access to the coast, but without overburdening or endangering the coastal resources and natural environment beyond a reasonable carrying capacity. Just within the past year, the National Park Service realized that the Muir Woods National Monument was being “loved to death” by overcrowding due to unbridled surges of traffic and visitors, so they decided to go to a reservation system to better moderate the flows of traffic, buses, and tourists and to protect both the visitor experience and the natural resource.

Our coastal communities are experiencing a similar fate knowing that we are often beyond our maximum carrying capacities for traffic and meeting visitor needs and demands. Coastal villages have always been open and welcoming to visitors and residents alike, with long histories of shared mutual benefit, but more recently the very resources and fabrics of the communities are wearing thin. If coastal communities are going to continue to be such loved destinations, then there needs to be a shared interest in protecting their infrastructures, buildings, services, and their unique histories that make them such wonderful and beloved destinations.

It is this increasing popularity, as well as conditions imposed by coastal development permits, that are becoming a real threat to the viability of coastal communities for both visitors and residents, so we urge the inclusion of the modified language and objective as recommended in the attached ACMV letter so that the unique characteristics of our special communities can continue to thrive as visitor destinations.

Sincerely yours,

Muir Beach Community Services District

By   
Mary Halley, District Manager

**Mary Halley**

District Manager

Muir Beach Community Services District

19 Seacape Drive, Muir Beach, CA 94965

Office: 415-383-9969

Voicemail: 415-388-7804

Cell: 415-297-1831

[mary@muirbeachcsd.com](mailto:mary@muirbeachcsd.com)

cc: Supervisor Dennis Rodoni, Marin County Board of Supervisors, District 4  
Katie Rice, Commissioner, California Coastal Commission  
Jennifer Blackman, Chair, Alliance of Coastal Marin Villages



## Alliance of Coastal Marin Villages

*Bolinas, Dillon Beach, Inverness, Inverness Park, Marshall, Muir Beach, Olema,  
Point Reyes Station, Stinson Beach, Tomales*

February 6, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

By email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

Re: Comments on the Public Review Draft California Coastal Commission Strategic Plan 2020-2025.

Dear California Coastal Commission, Executive Division:

The Alliance of Coastal Marin Villages (“ACMV”) consists of representatives of all the villages located in unincorporated West Marin County that are in the Coastal Zone: Bolinas, Dillon Beach, Inverness, Inverness Park, Marshall, Muir Beach, Olema, Point Reyes Station, Stinson Beach and Tomales. The ACMV formed as a result of meetings convened by California State Senator Mike McGuire to assess the impacts of (and formulate solutions to) the problems posed by increased tourism to West Marin, which has strained local resources and degraded the coastal visitation experience. The ACMV meets regularly to discuss and address issues of common concern, and on a quarterly basis with Marin County Supervisor Dennis Rodoni.

We write today to urge the California Coastal Commission (“CCC”) and its staff to correct an omission in the draft Strategic Plan for 2020 – 2025 (version 12/6/19). The Strategic Plan should include a Goal and several Objectives in accordance with the statutory direction of PRC §30253(e):

*§30253 New development shall do all of the following:*

*... .*

*(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.*

As stated in Marin County’s Local Coastal Plan with respect to PRC§ 30253: “[t]he intent of this policy is to protect the unique character of existing coastal communities.” Almost all of our villages are special communities that, because of their unique characteristics, are popular visitor destinations. Like similar small villages up and down the California coast, these villages are suffering the consequences of substantially increased numbers of coastal visitors — numbers far greater than when the Coastal Act became law.<sup>1</sup> The villages need protection and relief from the effects of increasing numbers of recreational visitors. The villages face significant financial and logistical challenges to providing services to the additional visitors while at the same time protecting the coastal environment and maintaining their community character. Indeed, it is the very special character of these villages that makes them such popular visitor destinations in the first place.

Increasing tourism to our communities has these impacts: excessive trash; stress on local water and sanitation systems; the need for more public bathrooms; traffic congestion; traffic-related threats to public safety; noise and disturbance of fragile local ecosystems; and parking challenges for visitors and locals alike. Addressing

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<sup>1</sup> The impacts of increased tourism to our area caused the Marin County Board of Supervisors to underwrite a study, AECOM, “West Marin Visitor Needs Assessment” (May 2017), which predicted substantial growth in visitor numbers in the years ahead. Senator Mike McGuire hosted overflow meetings on the subject in Point Reyes Station in 2017 and 2019.

these impacts often exceeds the capacity of existing infrastructure and local financial resources. As directed by the Coastal Act, the CCC needs to balance the laudable goal of preserving public access against these impacts to ensure there is reasonable management of public access, financial resources for impacted communities to retain their special character, and attention to these consequences in connection with new development and other CCC policies.

Thus, in accordance with Coastal Act Section 30253(e), we ask that an additional Objective be added to the Draft Strategic Plan, “Coastal Resources – Goal 3 -- Protect and Enhance Coastal Resources”:

**Objective 3.x Protect the Unique Character of Special Communities and Neighborhoods.**

3.x.1 Update LCP guidance on protection of special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

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Like the protections of Objective 3.3 for agriculture (which served as a model for this proposed objective), including this Objective in the Strategic Plan 2020-2025 would ensure that the CCC and its staff will not fail to address the important protections for coastal communities granted under the Coastal Act.

These protections are of such importance to our villages and others along the California coast that they should also be mentioned in the Vision Statement. We propose this addition:

**Our Vision:**

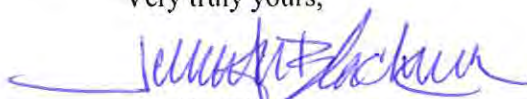
The California coast is available for all to enjoy through thousands of public accessways to and along the shoreline, a completed California Coastal Trail, a well-supported network of parks and open spaces, and a wide range of visitor-serving facilities, including lower-cost campgrounds, hostels, and hotels. The rich ecological diversity of the coast and ocean, including beaches, rocky shorelines, wetlands, riparian areas, and sensitive terrestrial habitats, is protected and thriving. Scenic rural landscapes are maintained, coastal agriculture is flourishing, the unique characteristics of the special communities and neighborhoods that attract coastal visitors are preserved, and cultural resources are protected. The California Coastal Commission works collaboratively with local governments, other agencies, and an engaged and knowledgeable public committed to coastal stewardship to support and manage environmentally-sustainable development, including assuring priority for coastal-dependent and related uses of land and water, concentrating new growth in existing urban areas, providing multi-modal public access and transportation, and promoting well-adapted, resilient communities in the face of global climate change. The coast endures as a vital part of California’s social and cultural fabric and the coastal and ocean economy is strong.



Letter to California Coastal Commission, Executive Division  
February 6, 2020  
Page Three

In closing, the members of the ACMV believe that the failure of the Draft Strategic Plan to specifically include an objective to preserve the special character of coastal communities and neighborhoods is an omission that needs to be corrected, and we respectfully request that the Commission and CCC staff revise the Draft Strategic Plan accordingly. Please contact me with any questions or if you would like more information about the ACMV. Thank you very much for this opportunity to comment on the Draft Strategic Plan.

Very truly yours,



Jennifer Blackman  
Chair, Alliance of Coastal Marin Villages

cc: Supervisor Dennis Rodoni, Marin County Board of Supervisors, District 4, [drodoni@marincounty.org](mailto:drodoni@marincounty.org)  
Senator Mike McGuire, California State Senate, District 2, [senator.mcguire@senate.ca.gov](mailto:senator.mcguire@senate.ca.gov)  
Assemblymember Marc Levine, California State Assembly, District 10, [assemblymember.levine@assembly.ca.gov](mailto:assemblymember.levine@assembly.ca.gov)  
Steve Padilla, Chair, California Coastal Commission, [Stephen.Padilla@coastal.ca.gov](mailto:Stephen.Padilla@coastal.ca.gov)  
Donne Brownsey, Vice Chair, California Coastal Commission, [Donne.Brownsey@coastal.ca.gov](mailto:Donne.Brownsey@coastal.ca.gov)  
Sara Aminzadeh, Commissioner, California Coastal Commission, [Sara.Aminzadeh@coastal.ca.gov](mailto:Sara.Aminzadeh@coastal.ca.gov)  
Dayna Bochco, Commissioner, California Coastal Commission, [Dayna.Bochco@coastal.ca.gov](mailto:Dayna.Bochco@coastal.ca.gov)  
Linda Escalante, Commissioner, California Coastal Commission, [Linda.Escalante@coastal.ca.gov](mailto:Linda.Escalante@coastal.ca.gov)  
Carole Groom, Commissioner, California Coastal Commission, [Carole.Groom@coastal.ca.gov](mailto:Carole.Groom@coastal.ca.gov)  
Dr. Caryl Hart, Commissioner, California Coastal Commission, [Caryl.Hart@coastal.ca.gov](mailto:Caryl.Hart@coastal.ca.gov)  
Erik Howell, Commissioner, California Coastal Commission, [Erik.Howell@coastal.ca.gov](mailto:Erik.Howell@coastal.ca.gov)  
Katie Rice, Commissioner, California Coastal Commission, [Katie.Rice@coastal.ca.gov](mailto:Katie.Rice@coastal.ca.gov)  
Effie Turnbull-Sanders, Commissioner, California Coastal Commission, [Effie.Turnball-Sanders@coastal.ca.gov](mailto:Effie.Turnball-Sanders@coastal.ca.gov)  
Roberto Uranga, Commissioner, California Coastal Commission, [Roberto.Uranga@coastal.ca.gov](mailto:Roberto.Uranga@coastal.ca.gov)  
Mike Wilson, Commissioner, California Coastal Commission, [Mike.Wilson@coastal.ca.gov](mailto:Mike.Wilson@coastal.ca.gov)

**East Shore Planning Group  
P. O. Box 827  
Marshall, CA 94940**

February 7, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

By email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

Re: California Coastal Commission Strategic Plan 2020-2025  
Comments on the Public Review Draft

Dear California Coastal Commission, Executive Division:

I write on behalf of the East Shore Planning Group. ESPG is a member organization of around 90 owners and tenants of residential, commercial, and agricultural properties in Marshall and along the East Shore of Tomales Bay. We are a member of the Alliance of Coastal Marin Villages, which has recently submitted comments on the Draft Strategic Plan referenced above. A copy of those comments is attached.

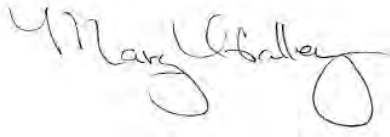
ESPG strongly supports the comments of the Alliance of Coastal Marin Villages and urges the Commission and Commission Staff to modify the Strategic Plan accordingly, to protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses, as mandated in §30253(e) of the Coastal Act.

Indeed, Marshall is a “poster child” for the purposes for which §30253(e) was enacted. Since the narrow-gauge railway from Sausalito opened in the 1870s, Marshall has been a Mecca for tourists seeking the coastal experiences of boating, fishing, hunting and enjoyment of the natural beauty, as well as consuming oysters and other locally harvested seafood. The ranches along the shore produce the highest quality organic milk, livestock and cheeses for which the area is renown. The historic buildings, small boatyard and modest coast-side dwellings add to the ambience and character of Marshall and the entire area.

But the area’s increasing popularity, as well as conditions imposed by the Coastal Commission and its staff in connection with coastal development permits, are very real threats to the community’s viability for visitors and residents alike. So it is of vital importance to consider the protection of the coastal resources and the community character of our villages along with the other resources that the Coastal Act protects, and that should be specified in the Strategic Plan.

Accordingly, we urge the amendment of the Strategic Plan as recommended in the attached letter so that the unique characteristics of our special community and neighborhoods can continue to thrive as visitor destination points.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mary Halley". The signature is written in a cursive style with a large, prominent loop at the end.

Mary Halley, President

CC: Katie Rice, Commissioner, California Coastal Commission  
Dennis Rodoni, Supervisor, Marin County Board of Supervisors, District 4  
Jennifer Blackman, Chair, Alliance of Coastal Marin Villages



# Alliance of Coastal Marin Villages

*Bolinas, Dillon Beach, Inverness, Inverness Park, Marshall, Muir Beach, Olema,  
Point Reyes Station, Stinson Beach, Tomales*

February 6, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

By email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

Re: Comments on the Public Review Draft California Coastal Commission Strategic Plan 2020-2025.

Dear California Coastal Commission, Executive Division:

The Alliance of Coastal Marin Villages (“ACMV”) consists of representatives of all the villages located in unincorporated West Marin County that are in the Coastal Zone: Bolinas, Dillon Beach, Inverness, Inverness Park, Marshall, Muir Beach, Olema, Point Reyes Station, Stinson Beach and Tomales. The ACMV formed as a result of meetings convened by California State Senator Mike McGuire to assess the impacts of (and formulate solutions to) the problems posed by increased tourism to West Marin, which has strained local resources and degraded the coastal visitation experience. The ACMV meets regularly to discuss and address issues of common concern, and on a quarterly basis with Marin County Supervisor Dennis Rodoni.

We write today to urge the California Coastal Commission (“CCC”) and its staff to correct an omission in the draft Strategic Plan for 2020 – 2025 (version 12/6/19). The Strategic Plan should include a Goal and several Objectives in accordance with the statutory direction of PRC §30253(e):

*§30253 New development shall do all of the following:*

... .

*(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.*

As stated in Marin County’s Local Coastal Plan with respect to PRC§ 30253: “[t]he intent of this policy is to protect the unique character of existing coastal communities.” Almost all of our villages are special communities that, because of their unique characteristics, are popular visitor destinations. Like similar small villages up and down the California coast, these villages are suffering the consequences of substantially increased numbers of coastal visitors — numbers far greater than when the Coastal Act became law.<sup>1</sup> The villages need protection and relief from the effects of increasing numbers of recreational visitors. The villages face significant financial and logistical challenges to providing services to the additional visitors while at the same time protecting the coastal environment and maintaining their community character. Indeed, it is the very special character of these villages that makes them such popular visitor destinations in the first place.

Increasing tourism to our communities has these impacts: excessive trash; stress on local water and sanitation systems; the need for more public bathrooms; traffic congestion; traffic-related threats to public safety; noise and disturbance of fragile local ecosystems; and parking challenges for visitors and locals alike. Addressing

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<sup>1</sup> The impacts of increased tourism to our area caused the Marin County Board of Supervisors to underwrite a study, AECOM, “West Marin Visitor Needs Assessment” (May 2017), which predicted substantial growth in visitor numbers in the years ahead. Senator Mike McGuire hosted overflow meetings on the subject in Point Reyes Station in 2017 and 2019.

these impacts often exceeds the capacity of existing infrastructure and local financial resources. As directed by the Coastal Act, the CCC needs to balance the laudable goal of preserving public access against these impacts to ensure there is reasonable management of public access, financial resources for impacted communities to retain their special character, and attention to these consequences in connection with new development and other CCC policies.

Thus, in accordance with Coastal Act Section 30253(e), we ask that an additional Objective be added to the Draft Strategic Plan, “Coastal Resources – Goal 3 -- Protect and Enhance Coastal Resources”:

**Objective 3.x Protect the Unique Character of Special Communities and Neighborhoods.**

3.x.1 Update LCP guidance on protection of special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

3.x.2 Encourage sensible management solutions and sources of financial support where increased coastal tourism threatens environmental resources, the character of coastal communities, the financial ability of local agencies to serve tourist needs, and/or the visitor experience.

3.x.3 Outreach to coastal communities to promote information-sharing on key issues relating to the management of increasing tourism through guidance documents, webinars, and/or workshops.

Like the protections of Objective 3.3 for agriculture (which served as a model for this proposed objective), including this Objective in the Strategic Plan 2020-2025 would ensure that the CCC and its staff will not fail to address the important protections for coastal communities granted under the Coastal Act.

These protections are of such importance to our villages and others along the California coast that they should also be mentioned in the Vision Statement. We propose this addition:

**Our Vision:**

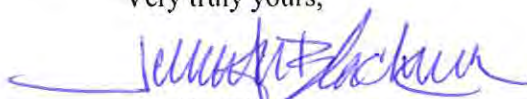
The California coast is available for all to enjoy through thousands of public accessways to and along the shoreline, a completed California Coastal Trail, a well-supported network of parks and open spaces, and a wide range of visitor-serving facilities, including lower-cost campgrounds, hostels, and hotels. The rich ecological diversity of the coast and ocean, including beaches, rocky shorelines, wetlands, riparian areas, and sensitive terrestrial habitats, is protected and thriving. Scenic rural landscapes are maintained, coastal agriculture is flourishing, the unique characteristics of the special communities and neighborhoods that attract coastal visitors are preserved, and cultural resources are protected. The California Coastal Commission works collaboratively with local governments, other agencies, and an engaged and knowledgeable public committed to coastal stewardship to support and manage environmentally-sustainable development, including assuring priority for coastal-dependent and related uses of land and water, concentrating new growth in existing urban areas, providing multi-modal public access and transportation, and promoting well-adapted, resilient communities in the face of global climate change. The coast endures as a vital part of California’s social and cultural fabric and the coastal and ocean economy is strong.



Letter to California Coastal Commission, Executive Division  
February 6, 2020  
Page Three

In closing, the members of the ACMV believe that the failure of the Draft Strategic Plan to specifically include an objective to preserve the special character of coastal communities and neighborhoods is an omission that needs to be corrected, and we respectfully request that the Commission and CCC staff revise the Draft Strategic Plan accordingly. Please contact me with any questions or if you would like more information about the ACMV. Thank you very much for this opportunity to comment on the Draft Strategic Plan.

Very truly yours,



Jennifer Blackman  
Chair, Alliance of Coastal Marin Villages

cc: Supervisor Dennis Rodoni, Marin County Board of Supervisors, District 4, [drodoni@marincounty.org](mailto:drodoni@marincounty.org)  
Senator Mike McGuire, California State Senate, District 2, [senator.mcguire@senate.ca.gov](mailto:senator.mcguire@senate.ca.gov)  
Assemblymember Marc Levine, California State Assembly, District 10, [assemblymember.levine@assembly.ca.gov](mailto:assemblymember.levine@assembly.ca.gov)  
Steve Padilla, Chair, California Coastal Commission, [Stephen.Padilla@coastal.ca.gov](mailto:Stephen.Padilla@coastal.ca.gov)  
Donne Brownsey, Vice Chair, California Coastal Commission, [Donne.Brownsey@coastal.ca.gov](mailto:Donne.Brownsey@coastal.ca.gov)  
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Katie Rice, Commissioner, California Coastal Commission, [Katie.Rice@coastal.ca.gov](mailto:Katie.Rice@coastal.ca.gov)  
Effie Turnbull-Sanders, Commissioner, California Coastal Commission, [Effie.Turnball-Sanders@coastal.ca.gov](mailto:Effie.Turnball-Sanders@coastal.ca.gov)  
Roberto Uranga, Commissioner, California Coastal Commission, [Roberto.Uranga@coastal.ca.gov](mailto:Roberto.Uranga@coastal.ca.gov)  
Mike Wilson, Commissioner, California Coastal Commission, [Mike.Wilson@coastal.ca.gov](mailto:Mike.Wilson@coastal.ca.gov)



TO: Coastal Commission Executive Division, [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)  
FROM: Mary Small, Deputy Executive Officer *Mary Small*  
DATE: February 7, 2020  
RE: Comments on the Coastal Commission's draft Strategic Plan

Thank you for the opportunity to comment of the Coastal Commission's draft Strategic Plan. We applaud the detailed draft plan and the many priorities it includes. The following comments are offered to highlight ways in which we could enhance our strong partnership and advance our shared goals.

Coastal Conservancy staff encourages the Coastal Commission (Commission) to embrace the Resources Agency's "Cutting Green Tape" initiative and to look for opportunities to decrease the time, work, and cost of obtaining Coastal Development Permits for restoration and living shoreline projects. Making it easier to obtain permits for these projects, the Commission could significantly contribute to Objective 3.1 to advance habitat restoration and Objective 4.2 to support sea level rise adaptation projects. Under Goal 6, specific objectives and actions could be added related to making the permitting process more efficient for applicants working on restoration and living shoreline projects, such as:

- Expand de minimus permits to cover more restoration, enhancement or living shoreline projects.
- Assigning staff to engage in project planning, to coordinate with other agencies and to ensure the same staff work on a project from start to finish.

The Conservancy has been a leader in developing and installing nature-based sea level rise adaptation projects along the coast. These projects are important to test such approaches on the west coast and to increase the use of these multi benefit strategies for sea level rise adaptation. There is enormous urgency to install and monitor the performance of these projects soon, before sea level rise accelerates. We encourage the Commission to proactively support these projects. Action 4.2.3 could be rewritten to: encourage implementation and monitoring of pilot nature-based adaptation strategies such as living shorelines and green infrastructure by reducing permitting hurdles. Action 4.3.5 seems to treat beach nourishment, shoreline armoring, and living shorelines as similar shoreline management practices. These practices should have separate guidance and permitting tracks to encourage living shorelines consistent with the Commission's own sea level rise guidance. Post project monitoring for shoreline armoring and nourishment projects should be adequate to compare the impacts of these projects to alternatives.

Finally, we are pleased to continue our ongoing coordination related to the use of the Violation Remediation Account funds. However, we do not support inclusion of Action 7.4.2. The Conservancy and Commission should focus our limited staff resources and avoid overlap in identifying and prioritizing projects. The Commission has the ability to enforce the Coastal Act, whereas the Conservancy has the mandate to develop and prioritize projects. Our agencies should continue to coordinate these efforts but should avoid duplicating efforts.

1515 Clay Street, 10th Floor  
Oakland, California 94612-1401  
510-286-1015 Fax: 510-286-0470



February 8, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, Ca 94105

By email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

Re: Comments on the Public Review Draft California Coastal Commission Strategic Plan 2020-2025

Dear California Coastal Commission, Executive Division

I write on behalf of the Local Coastal Program Committee for the East Shore Planning Group representing the residents of Marshall. Our LCP group is committed to providing a conduit to Marin County and California Coastal Commission staff regarding our residents' concerns regarding maintaining the special character of our historical coastal village.

Our LCP Committee strongly supports the comments of the Alliance of Coastal Marin Villages and we urge the Commission and Commission staff to modify the Strategic Plan accordingly to protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses as mandated in item 30253(e) of the Coastal Act.

Marshall is indeed a very popular visitor destination for folks visiting the Coast. However, our villages' increased popularity, as well as conditions imposed by the Coastal Commission and its staff in connection with coastal development permits, now present very real threats to our communities' viability for visitors and residents.

A recent example - the reconstruction of the iconic Marshall Tavern, a derelict building dating back to the 19th century. As a condition to the coastal development permit, the owners are required to dedicate a lot once occupied by the Marshall Hotel for use as a public pier and boat launch open 24 hours a day. This new mandated use for which there is no parking in an area that is already dangerously impacted by the immense popularity of nearby Hog Island Oyster Company can only compromise the community character of the neighboring historic buildings that provide both housing and vacation rentals. Additionally, the pier location ignores §30212.5 of the Coastal Act, which requires "*public facilities to be distributed throughout an area so as to mitigate against impacts, social and otherwise, of overcrowding or overuse by the public of any single area.*" The public pier in that location will adversely affect our community and the

public's experience in enjoying the unique characteristics of Marshall that attract coastal visitors and is imminently unsafe for both the public and the residents at that location.

An alternative location for the pier should be considered. The Strategic Plan, item 2.2.5 states *"initiate a Memorandum of Understanding (MOU) with California State Parks to improve collaboration and coordination on expanding public access and recreation opportunities through planning, permitting and enforcement processes."* Working with State Parks might allow for the "pier" to be relocated to the Marconi Cove Marina property, a much safer and convenient area for public access with adequate available parking. Marconi Cove is a state parks property.

We would also ask you to consider the fact that provisions of the Sea-Level-Rise Adaptation Guidance contain many onerous provisions that can prevent economical maintenance of existing development for use in the decades ahead. The inevitable result is that only the wealthy, absentee second homeowners or vacation-rental investors who can afford complying with the conditions, will become the owners of Marshall; or worse yet, the buildings will become derelict and abandoned. Already these pressures are affecting the availability of affordable housing and the very survival of the special community and neighborhoods of Marshall. Indeed, a loss for everyone.

Accordingly, we urge the amendment of the Strategic Plan as recommended in the attached letter so that the unique characteristics of our special community and neighborhoods can continue to thrive as visitor destination points.

Sincerely yours,

*Ann Grymes*

Ann Grymes, LCP Committee of East Shore Planning Group



# Alliance of Coastal Marin Villages

*Bolinas, Dillon Beach, Inverness, Inverness Park, Marshall, Muir Beach, Olema,  
Point Reyes Station, Stinson Beach, Tomales*

February 6, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
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Increasing tourism to our communities has these impacts: excessive trash; stress on local water and sanitation systems; the need for more public bathrooms; traffic congestion; traffic-related threats to public safety; noise and disturbance of fragile local ecosystems; and parking challenges for visitors and locals alike. Addressing

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These protections are of such importance to our villages and others along the California coast that they should also be mentioned in the Vision Statement. We propose this addition:

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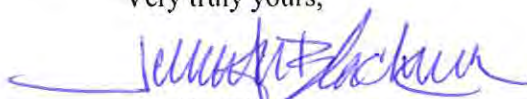
The California coast is available for all to enjoy through thousands of public accessways to and along the shoreline, a completed California Coastal Trail, a well-supported network of parks and open spaces, and a wide range of visitor-serving facilities, including lower-cost campgrounds, hostels, and hotels. The rich ecological diversity of the coast and ocean, including beaches, rocky shorelines, wetlands, riparian areas, and sensitive terrestrial habitats, is protected and thriving. Scenic rural landscapes are maintained, coastal agriculture is flourishing, the unique characteristics of the special communities and neighborhoods that attract coastal visitors are preserved, and cultural resources are protected. The California Coastal Commission works collaboratively with local governments, other agencies, and an engaged and knowledgeable public committed to coastal stewardship to support and manage environmentally-sustainable development, including assuring priority for coastal-dependent and related uses of land and water, concentrating new growth in existing urban areas, providing multi-modal public access and transportation, and promoting well-adapted, resilient communities in the face of global climate change. The coast endures as a vital part of California’s social and cultural fabric and the coastal and ocean economy is strong.



Letter to California Coastal Commission, Executive Division  
February 6, 2020  
Page Three

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Very truly yours,



Jennifer Blackman  
Chair, Alliance of Coastal Marin Villages

cc: Supervisor Dennis Rodoni, Marin County Board of Supervisors, District 4, [drodoni@marincounty.org](mailto:drodoni@marincounty.org)  
Senator Mike McGuire, California State Senate, District 2, [senator.mcguire@senate.ca.gov](mailto:senator.mcguire@senate.ca.gov)  
Assemblymember Marc Levine, California State Assembly, District 10, [assemblymember.levine@assembly.ca.gov](mailto:assemblymember.levine@assembly.ca.gov)  
Steve Padilla, Chair, California Coastal Commission, [Stephen.Padilla@coastal.ca.gov](mailto:Stephen.Padilla@coastal.ca.gov)  
Donne Brownsey, Vice Chair, California Coastal Commission, [Donne.Brownsey@coastal.ca.gov](mailto:Donne.Brownsey@coastal.ca.gov)  
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Roberto Uranga, Commissioner, California Coastal Commission, [Roberto.Uranga@coastal.ca.gov](mailto:Roberto.Uranga@coastal.ca.gov)  
Mike Wilson, Commissioner, California Coastal Commission, [Mike.Wilson@coastal.ca.gov](mailto:Mike.Wilson@coastal.ca.gov)

**From:** [Hilary Avalon](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** California Coastal Commission Strategic Plan 2020-2025  
**Date:** Sunday, February 09, 2020 7:25:57 AM

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Dear California Coastal Commission, Executive Division:

I am a home owner in Dillon Beach and I strongly support the Alliance of Coastal Marin Villages in its comments on the Public Review Draft California Coastal Commission Strategic Plan 2020-2025. I think it is very important the California Coastal Commission correct the omission of protection of special coastal communities in the version 12/6/2019 of the draft Strategic Plan for 2020-2025.

The Strategic Plan should be revised to include a Goal and Objective to protect special communities and neighborhoods that, because of their unique characteristics, are not only wonderful places to live but are also popular visitor destination points for recreational uses, as cited in PRC30253(e.) If our historic, well-maintained villages lose protection for their infrastructure, workers, businesses and residences, they will lose their appeal to visitors as well. It is the coastal stewardship of our villages, our well-adapted resilient communities, which provides the vital core of coastal California's social and cultural fabric and vibrant economy.

The 12/6/2019 draft of the California Coastal Commission Strategic Plan 2020-2025 has no provision for supporting our communities. I join the Dillon Beach Neighborhood Group, the Alliance of Coastal Marin Villages, and others in the request that the Commission and CCC staff revise the Plan to correct this omission.

Thank you for this opportunity to comment.

Sincerely,  
Hilary Avalon



**From:** [Melinda Bell](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Dillon Beach Neighborhood Group Comments  
**Date:** Sunday, February 09, 2020 9:38:49 AM  
**Attachments:** [80555c21.png](#)

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**Dillon Beach Neighborhood Group**

**Post Office Box 242**

**Dillon Beach, CA 94929**

[dbneighborhoodgroup@gmail.com](mailto:dbneighborhoodgroup@gmail.com)

February 9, 2020

**California Coastal Commission Executive Division**

45 Fremont Street, Suite 2000

San Francisco, CA 94105

By email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

Dear California Coastal Commission, Executive Division:

The Dillon Beach Neighborhood Group strongly supports the Alliance of Coastal Marin Villages in its comments on the Public Review Draft California Coastal Commission Strategic Plan 2020-2025. We urge the California Coastal Commission to correct the omission of protection of special coastal communities in the version 12/6/2019 of the draft Strategic Plan for 2020-2025.

The Strategic Plan should be revised to include a Goal and Objectives to protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses, as cited in PRC30253(e.) If our historic well-maintained villages lose protection for our infrastructure, workers, businesses and residences, they will lose their appeal to visitors as well. It is the coastal stewardship of our villages, our well-adapted resilient communities, which provides the vital core of coastal California's social and cultural fabric and vibrant economy.

The 12/6/2019 draft of the California Coastal Commission Strategic Plan 2020-2025 has no provision for supporting our communities. The Dillon Beach Neighborhood Group joins the Alliance of Coastal Marin Villages in its request that the Commission and CCC staff revise the Plan to correct this omission



Melinda K, Bell

Dillon Beach Neighborhood Group

641 Paddlewheel Court  
Roseville, CA 95747  
February 9, 2020

Steve Padilla, Chair  
Coastal Commissioners  
California Coastal Commission  
45 Fremont St., Suite 2000  
San Francisco, CA 94105

Re: Draft California Coastal Commission Strategic Plan 2020-2025

Dear Chair Padilla and Commissioners:

I write regarding the Commission's Draft Strategic Plan. While I think that there are many positive directions indicated in the Draft, I am concerned that there is not a clear focus upon the Commission's information gathering and hearing processes, which are critical to the implementation of all of the Commission's Goals, Objectives, and Actions. I also urge the Commission to identify and focus clearly upon the actions necessary to implement its priorities within the Plan, rather than allow those to drift into the background of the monthly agenda work and become simply empty words on paper.

Specifically, I request that the Commission:

- Establish within the Strategic Plan a new Goal to improve the quality of public participation in the Commission's decision-making process by examining the ways in which it gathers, retains and distributes the information upon which it makes its decisions, particularly its quasi-judicial decisions; and then by changing its procedures and practices, as appropriate, in light of that examination;
- Establish Commission priorities among the various Goals, Objectives and Actions contained within the Draft Strategic Plan in the context of a thorough examination of the Commission's existing and attainable projected funding and staffing levels;
- Ensure that the various Goals, Objectives and Actions are realized through careful Commission monitoring of their accomplishment during the projected timeline of the Plan; and,
- Assist the staff to overcome difficulties that might impede accomplishment of the Goals, Objectives and Actions of the Plan throughout its projected timeline.

At the Commission's September, 2019 meeting I presented a summary of the UCLA Law Pritzker Brief: "The California Coastal Commission: Increasing Transparency, Accountability, and Opportunities for Effective Public Participation". <https://law.ucla.edu/centers/environmental-law/emmett-institute-on-climate-change-and-the-environment/publications/calif-coastal-commission-increasing-transparency-accountability-for-effective-public-participation/>. The Commission followed that presentation with a discussion during which most of the Commissioners agreed with a number, though not all, of those recommendations. Since then, however, it does not appear that either that critique of the Commission's processes, or the



Commissioners' comments regarding possible changes have produced any action with respect to the Commission's hearing process. The Draft Strategic Plan circulated for comment at the Commission's February meeting confirms this. There is almost no discussion of the Commission's information gathering and public hearing process, and only a few of the recommendations in the Pritzker Brief are mentioned, and these somewhat tangentially.

A glance at the Commission's monthly agenda indicates that the Commission spends almost all of its time on public hearings, mostly of the quasi-judicial variety (such as permits, local coastal programs and federal consistency matters). In turn, the Commission staff spends most of its time outside of these meetings gathering, analyzing and presenting information for the Commission's review regarding its decisions at these hearings. In the context of the Legislature's declarations that "the public has a right to fully participate in decisions affecting coastal planning, conservation and development", that achievement of the Commission's goals is "dependent upon public understanding and support", and that implementation of the Commission's programs "should include the widest opportunity for public participation" (Public Resources Code § 30006), the process of gathering and sharing the information upon which those decisions are based is critical to public understanding, participation and support.

Specifically, ensuring that the Commission's information gathering and hearing process is fair and transparent, is accountable, and maximizes the public's opportunities for participation is fundamental to implementation of the Coastal Act. While it makes perfect sense for the Commission to call out in its Plan critical goals such as maximizing public access, protecting and enhancing coastal resources, and supporting resilient coastal communities, the actions necessary to achieve these goals do not occur in a vacuum. They occur pursuant to a continuing series of Commission decisions made pursuant to the Coastal Act and the Commission's procedures and practices. The process of making these decisions is foundational to all that the Commission does.

When the Commission is aware, as it has been for years, that there are correctable major deficiencies in that process, and further, that there are ways that the Commission's procedures and internal processes can be improved to further transparency and enhance public participation, correction of these deficiencies and changes to those procedures and processes should be a high priority. Yet the Draft Strategic Plan is silent on this. Several of the recommendations contained within the Pritzker Brief are mentioned (in Plan Objectives 5.2.5 and 9.3 – 9.5), but they are without context. There is no discussion of the information gathering and public hearing process. The Objective to "Improve the Regulatory Process", contained within the 2013 Strategic Plan has been dropped from this draft of the Strategic Plan. While the Commission has, since the previous Plan, adopted a beneficial package of regulatory changes that became effective at the beginning of this year, these changes did not follow upon a fundamental examination of the Commission's decision-making process or address the kinds of process concerns that have been expressed to the Commission since the 2013 Plan.

Therefore, the Commission should initiate a process to evaluate changes to the ways that it gathers and distributes information and conducts public hearings on matters that come before



it, particularly on the quasi-judicial matters that form the bulk of the Commission's work at its meetings (permits, local coastal programs and consistency matters). This review by the Commission itself, and the actions taken pursuant to it should be made an explicit Goal of the Strategic Plan, with Objectives and Actions identified to achieve that Goal. The Commission review will appropriately identify matters that could and should be changed. These may include some but not necessarily all of the recommendations made in the report referenced above, and they may include other recommendations that result from this public review process that were not contemplated in that report. Timely implementation of the changes upon which the Commission agrees, and that come out of this Commission review, are what matters.

This leads to two further recommendations. First, this Commission review, and implementation of the changes that result from that review should be given the highest priority by the Commission, precisely because improvement of the process of public participation in the Commission's critical work implementing the Coastal Act is foundational to that work. Gathering information and conducting hearings without consideration of the process by which that is done is like cooking without concerning oneself with the quality of the ingredients or the necessary technique. The quality of the public participation process is essential. Second, although many of the changes that the Commission might identify can be implemented through internal Commission action (e.g. Draft Objective 9.4.1, the Web interface to support public access to the CDMS), some actions might require public actions or changes to the Commission's regulations. This should not be a cause for trepidation or inaction.

For example, the Pritzker Brief recommended that the Commission close the public record for "written submissions and ex parte communications sufficiently in advance of the hearing at which the decision is to be made to allow all participants the opportunity to understand, evaluate and respond at the hearing to the submitted information". Many of the Commissioners responded favorably at the September hearing to this recommendation. If the Commission were to decide to do this, it would require a change to the Commission's regulations. Some might be concerned that this would be an increase in workload, particularly since the Commission just amended its regulations. But the Commission did not evaluate this potential change when it considered the last regulatory package. Further, the Commission is the judge of whether changes such as this would be beneficial, and regulatory change need not be open-ended; it can be quite focused. If the Commission decides that it only wants to make a limited number of changes to its regulations, it can do so, and the work involved is similarly limited. The only consideration is whether the quality of the change is worth the quantity of the work. With respect to that particular recommendation, I think the answer is clearly that it is.

Finally, the Commission needs to pay continuing attention over the life of the Strategic Plan to the realization of the various Goals, Objectives and Actions in the Plan. If the attainment of some of these matters is impeded, the Commission should not hesitate to involve itself in assisting staff to accomplish what the Commission has said that it wanted to achieve; to overcome or circumvent the roadblocks to success. If, for example, additional staff or funding is needed, the Commissioners may be able to assist in obtaining that. It is difficult to assess from the outside how high or of what nature the roadblocks to achievement may be. In the 2013



Plan, staff asserted, as it has in this Draft, that additional staff and funding would be necessary to achieve the various Goals and Objectives because of the Commission's heavy regulatory workload. Subsequent to that the Commission certified the LCP for the Santa Monica Mountains, perhaps the largest single source of regulatory work at the time, and obtained an additional 24 coastal program analyst positions through the budget process. Is that reduction of workload and addition of staff still insufficient to allow for the completion of the various Goals, Objectives and Actions of this Plan? Only the Commission, working closely with staff, can properly assess the need for resources in relation to the scope of work required.

A different problem is presented in relation to the Goal of "Enhancing Information Management and E-Government". This was, similarly, a "priority goal" of the 2013 Plan. Achievement of this Goal remains elusive. Take for example, Action # 9.4.1: "Create and deploy an on-line web-interface to support public access to the CDMS". Staff has been attempting to achieve this Goal since before the 2013 Plan, but a number of technical issues, perhaps related to the performance of the contracted consulting software developers, have prevented its achievement. Again, it may be that direct Commissioner involvement could assist the staff to overcome whatever roadblocks may be impeding achievement of this web-interface for the public. Certainly, the end result, working public access to the CDMS, would significantly enhance the quality of public participation in the Commission's decision-making process.

Both of these examples indicate the importance of continuing Commissioner involvement to ensure the achievement of the Goals, Objectives and Actions of the Strategic Plan. Treating it as a matter of concern only every five or so years will not ensure that its highly desirable goals and objectives are achieved.

Therefore, I respectfully request that you take these recommendations, as embodied in the four bullet points, into consideration as you consider the Draft Strategic Plan. The quality of the public process by which you gather information and make your decisions is critical to the quality of your implementation of the Coastal Act. Its importance needs specifically to be recognized in, and made a part of, that Plan. Further, the Commission needs to identify its priorities within the various Goals, Objectives and Actions contained within the Plan, and work with staff on a continuing basis after adoption of the Plan to help to overcome roadblocks to achievement and ensure that staff has the resources it needs to accomplish what the Commission has directed.

Thank you for your consideration of these comments.

Sincerely,



Ralph Faust

CC: John Ainsworth, Executive Director



# BOLINAS COMMUNITY PUBLIC UTILITY DISTRICT

BCPUD      BOX 390 270 ELM ROAD BOLINAS CALIFORNIA 94924      415 868 1224



February 10, 2020

**Via email: StrategicPlanComments@coastal.ca.gov**

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, California 94105

Re: Comments on the Public Review Draft California Coastal Commission Strategic Plan 2020-2025.

Dear California Coastal Commission, Executive Division:

On behalf of the Board of Directors of the Bolinas Community Public Utility District (“BCPUD”), a small special district on the West Marin coast providing water, sewer, solid waste disposal and related utility services to the unincorporated community of (and visitors to) Bolinas, I am submitting this letter of comment on the Commission’s Public Review Draft Strategic Plan 2020-25 (“Draft Plan”). The BCPUD is part of the Alliance of Coastal Marin Villages (“ACMV”) and we strongly support the comments submitted by the ACMV on the Draft Plan on February 6, 2020. **We urge the Commission to heed those comments and revise the Draft Plan to include the objectives proposed in the ACMV letter and revise the Vision statement to acknowledge the Commission’s mandate to protect the unique character of special communities and neighborhoods in the coastal zone per Section 30253(e) of the Coastal Act.**

For the town of Bolinas, the Coastal Act’s mandate to protect the special communities and neighborhoods in the coastal zone is of immense importance. In addition to the points articulated in the ACMV’s comment letter, we note that although Goal 4 in the Draft Plan purports to “support resilient coastal communities”, none of the listed objectives under Goal 4 actually do so. Instead, those objectives revolve entirely around the Commission’s goals of preserving public beaches and enhancing visitor access to the beaches. Admirable as those goals are, we submit that the Commission also must focus attention on the fates of the communities, including Bolinas, which front those beaches and attract coastal visitors. *For example, an objective should be included in Goal 4 stating that the Commission will seek to help existing coastal communities survive in the face of projected rising sea levels.* We acknowledge that this may require the Commission to balance competing provisions of the Coastal Act, namely: the protection of beaches vs. the need to protect existing local communities as sea levels rise. Indeed, this is the exact sort of balancing of priorities envisioned by the Coastal Act. *Another objective should be included to recognize the need to balance parking access for beach visitors with the protection of the character of existing local communities, especially in the face of ever-growing visitor traffic to the beaches and residential neighborhoods located there.* For example, Objective 2.2.3 should specifically include residential permit parking permits as a recommended option.

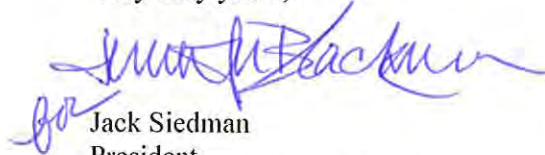
The BCPUD Board also believes the Draft Plan should explicitly acknowledge the California Legislature’s findings in Section 30604(g) of the Coastal Act, specifically:

*“The Legislature finds and declares that it is important for the commission to encourage the protection of existing and the provision of new affordable housing opportunities for persons of low and moderate income in the coastal zone.”*

As presently written, the preservation and promotion of affordable housing is almost entirely unmentioned in the Draft Plan. The Commission should correct this oversight and include a set of objectives under Goal 4 to work with local communities to protect and expand the development of affordable housing in the coastal zone because we believe that the coastal zone should not be the domain of only the most wealthy Californians. Indeed, such a result would be inconsistent with the Environmental Justice mandate of the Coastal Act addressed in Goal 5 of the Draft Plan. Coastal villages like Bolinas are experiencing a steep decline in full-time residents as the cost of living escalates due to pressures from the Bay Area economy combined with the exorbitant cost of coastal development permitting. These are the residents who provide the very “visitor-serving services” coastal tourists seek when visiting the coast – their experience would be significantly diminished were our villages to become ghost towns devoid of character, restaurants, shops, and emergency response, among other things.

Finally, we urge the Commission to modify Objectives 2.3 and 2.7 under Goal 2, Public Access, to focus on the promotion of public visitation to the undeveloped sections of the coast which currently are not overburdened by the impacts of excess visitation. To this end, we applaud the inclusion of Objectives 2.1.3 and 2.2.4 and the promotion of new and/or enhanced public facilities on state park lands in the coastal zone as well as enhanced parking, restroom and waste management facilities at state parts and along Highway 1. Thank you very much for the opportunity to submit these comments on the Draft Plan.

Very truly yours,



Jack Siedman  
President  
BCPUD Board of Directors

cc: Supervisor Dennis Rodoni, Marin County Board of Supervisors, District 4, [drodoni@marincounty.org](mailto:drodoni@marincounty.org)  
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Steve Padilla, Chair, California Coastal Commission, [Stephen.Padilla@coastal.ca.gov](mailto:Stephen.Padilla@coastal.ca.gov)  
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Effie Turnball-Sanders, Commissioner, California Coastal Commission, [Effie.Turnball-Sanders@coastal.ca.gov](mailto:Effie.Turnball-Sanders@coastal.ca.gov)  
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Mike Wilson, Commissioner, California Coastal Commission, [Mike.Wilson@coastal.ca.gov](mailto:Mike.Wilson@coastal.ca.gov)

# Mal Paso Creek Property Association

Route 1, Box 73, Carmel Highlands, CA 93923

10 February 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

RE: California Coastal Commission Strategic Plan 2020-2025 - Public Review Draft

Dear California Coastal Commissioners

On behalf of our property owners, we the board members of the Mal Paso Creek Property Association in Carmel Highlands, would like to comment on the proposed California Coastal Commission Strategic Plan 2020-2025.

## I. Introduction

### A. Implementation - Nine Goals

We are pleased to see that the CCC will maintain the goal of “protecting and enhancing coastal resources” as one of its 9 Priority Goals in this proposed 2020-2025 strategic plan. Continuing this goal is in line with the California Coastal Act of 1976, Chapter 1, Legislative Findings and Declarations, Section 30001: Ecological Balance: Item (b): That the permanent protection of the state’s natural and scenic resources is a paramount concern to present and future residents of the state and nation, and Section 30001.5, Item (a): Protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources and Chapter 3, Article 4, Section 30240: Environmentally sensitive habitat areas; adjacent developments: Item (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

This goal is important to maintain because we are seeing much damage and erosion from human traffic to the bluffs and beaches in our area and we worry about the fragile and sensitive habitats dwelling along our coastline that we feel should be protected by the CCC.

## II. Visions, Mission & Core Values

### A. Coastal Acts Vision for the Coast

**“Public access and recreation must be protected and maximized, and lower-cost, water-oriented, other visitor-serving land uses should be provided, and new development should be serviced by public transit and non-automobile options (PRC 30210-30224; 30252). Sensitive resources in the ocean and on land are to be protected (30230-30233; 30240).”**

Our area has publicly accessed beaches that are being desecrated due to campfires being left to burn out on their own, scaling kayaks down fragile and unstable cliffs, forging multiple trails through native coastal habitat, pilfering of native plants, leaving trash on the beaches, trails and streets and parties being held on the beaches until all hours in the morning. This all needs to be stopped and the beaches regulated and supervised.

## III. Goals, Objectives & Actions

### B. Public Access

**“Additionally, the Commission strives to ... encourage lower-cost visitor-serving opportunities and facilities (Objective 2.4). This includes working with the State Coastal Conservancy and California State Parks to identify, plan for, and provide new public access and lower-cost visitor-serving accommodations.”**

We feel that if the public is given access to the coast, visitor serving facilities should be provided such as restrooms and waste disposal containers. We have found that because there are very few public visitor serving facilities along the Big Sur coast, visitors are having to relieve themselves in the natural surroundings and are leaving their trash where they have parked and viewed the coast.

Another problem area is along Highway 1 next to Point Lobos State Reserve Park. It has become hazardous for pedestrians, bicyclists and vehicles traveling along that portion of highway due to the inadequate parking provided for the increasing number of vehicles needing to park along Highway 1.

We want to know what the CCC will provide in the way of public safety. Many places along our immediate coast are dangerous with high unstable cliffs and strong water currents and riptides. Our Monastery Beach has had many deaths due to visitors not knowing how dangerous the water is. Will the CCC provide or require State owned coastal areas to provide signage and lifeguards? We feel the CCC should weigh public safety as much of a priority along with public access. Not to do so is irresponsible.

#### C. Coastal Resources

**“The Commission implements strong Coastal Act policies to protect and restore environmentally sensitive habitats (“ESHA”), wetlands, and the marine environment along the coast.”**

Again we would like to know what provisions and protections the CCC will provide coastal habitats if visitor access is increased and what enforcements will be implemented for visitors damaging the coastal environments.

Also, what provisions will the CCC implement or support in the way of fuel reduction and other wildfire preventative measures along the coast. Wild fires have a devastating effect on coastal habitats due to polluted water runoff from the burned areas along with smoke and ash fallout, soil erosion, land slides as the fires in Malibu and Big Sur have shown.

#### F. Coastal Planning & Permitting

**“Seek funding to fully engage in the local planning process, including attending workshops and local public meetings and commenting on key documents instrumental in the development of LCPs or LCP Amendments.”**

The CCC needs to more fully/regularly include consideration of local residents and existing private land owners as they work with Caltrans, LCP's, and other agencies to encourage and expand public access therefore properly balancing their stated objective of increasing public access with the importance of traffic management, parking management, and preservation/respect of existing private property rights.

The community of Carmel Highlands needs to be engaged in all local processes of developing any Local Coastal Programs and Amendments. Our coastal areas are unique and precious to us and we want them protected and preserved for generations to come.

Respectfully Submitted,

Mal Paso Creek Property Association

Adrienne Berry  
Bonnie Burgess  
Ida Holber  
Sally Anne Smith

Bill Brandwein  
Fran Leve  
Steve Martin



# Albion Bridge Stewards

*A working group of the Albion Community Advisory Board*

P.O. Box 363  
Albion, CA 95410

## By Electronic Mail

[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)

[StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

February 11, 2020

Mr. John Ainsworth  
Executive Director  
and Staff  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

SUBJECT: DRAFT 2020-2025 STRATEGIC PLAN

Dear Mr. Ainsworth and Coastal Commission Staff,

Thank you for this opportunity for the Albion Bridge Stewards to comment on Coastal Commission staff's public review draft 2020-2025 Strategic Plan.

The Albion Bridge Stewards are a voluntary association of people who reside and work in Albion – a Coastal Act and federal California Coastal Management Program-designated special community – and coastal Mendocino County, with supporters throughout California, the United States, and the world. In the spirit of the Coastal Act and other environmental laws, we have organized to preserve, protect, and maintain the State and federally listed historic(al) Albion River Bridge on the wild and scenic Albion River, the nearby Salmon Creek Bridge, and the highly sensitive and scenic rural coastal environment in which Albion and its bridges along Highway 1 are located.

Our review of the draft Strategic Plan indicates that it omits the protection, maintenance, restoration, and enhancement of the several historic and other indispensable bridges, along our coast's vital Highway 1 artery, from among the proposed nine goals, 49 objectives, and 148 actions that would "guide" the Commission's work over the next five years. [1]

As you know, the legislature in enacting the Coastal Act specifically provided that the protection, maintenance, and, where feasible, enhancement and restoration of the overall quality of the coastal zone environment and its natural and human-made ("artificial") resources constitute the first of the State's five basic goals and objectives for the coastal program. (Coastal Act section 30001.5(a).) In addition, in response to inappropriate freeway and highway development in rural

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Email: [acab@mcn.org](mailto:acab@mcn.org)



coastal areas, the legislature also stated its clear intent that Highway (State Route) 1 in rural areas of the coastal zone remain a scenic two-lane road. (Coastal Act section 30254.) Further, the legislature required that "all (State, regional, and local) public agencies shall comply with the Coastal Act" (Coastal Act section 30003) and that "the public has a right to fully participate in decisions affecting coastal planning, conservation, and development; that achievement of sound coastal conservation and development is dependent upon public understanding and support; and that the continuing planning and implementation of programs for coastal conservation and development should include the widest opportunity for public participation." (Coastal Act section 30006.)

We therefore respectfully recommend and request that the Strategic Plan specifically and expressly do the following:

- State as a Coastal Commission Strategic Plan **goal** the protection, maintenance, and, where necessary and feasible, enhancement and restoration of the coastal zone environment and its historic(al) places and structures, environmentally sensitive habitat areas, designated special communities, and other essential public infrastructure, consistent with all applicable Coastal Act and federally approved California Coastal Management Program standards.
- Identify, as the related Coastal Commission Strategic Plan **objective**, the accomplishment of that goal through all proposed Highway 1 projects, between 2020 and 2025, that are in, or visible from, any designated highly scenic area, in or within 500 feet of any environmentally sensitive habitat area, and in or within one mile of any special community in the coastal zone.
- List the following **actions** to fully implement the Coastal Commission Strategic Plan goal and objective (including, as applicable, through additional Commission-promulgated regulations or adopted guidelines):
  1. Compile, maintain, and make accessible to the public an accurate and complete listing, with maps and electronic links to relevant information, of all historic(al) places and structures, designated special communities, and other essential public infrastructure (including Highway 1), as well as environmentally sensitive habitat areas, natural landforms, and coastal waters, in the coastal zone.
  2. Provide timely, accurate, and complete information to all known interested coastal program stakeholders about any application document, site inspection, written or ex parte communication, briefing meeting, public hearing, proposed action, and permit compliance report in relation to any CDP, CDP waiver, request for jurisdictional determination, request for local government jurisdiction relinquishment ("CDP consolidation"), consistency certification, consistency determination, public works plan approval, and LCP (LCP amendment) certification for all proposed Highway 1 projects, as described in the recommended Strategic Plan objective.
  3. Require publicly transparent independent peer review and reporting to the Commission of all Highway 1 project-related (or plan-related) applicant technical studies, prior to any project CDP application's being filed or deemed filed for Commission regulatory or certification review.
  4. Maximize substantive opportunities for public participation in the Coastal

Commission CEQA functional equivalent regulatory and planning processes through compliance with CEQA document review periods, in person or virtual public hearings in the project or plan location, fully transparent Commissioner (including ex officio Commissioner) and staff communications regarding any matter pending before the Commission, prohibition of any Commissioner's or staff's introduction or leading any witness after close of the public hearing, and a return to published (or posted) complete official Commission meeting minutes (rather than mere action minutes) and Commission litigation case/status summaries.

5. Require any Highway 1-related project, located within or visible from any designated highly scenic area, to stake and flag all proposed development areas, to demonstrate that the project will be subordinate to and fully compatible with its setting and the character of the designated special community.
6. Exclude any Highway 1-related project, located within or visible from any designated highly scenic area, in or within 500 feet of any environmentally sensitive habitat area, in or within 300 feet of any coastal waters, and in or within one mile of any special community in the coastal zone from any CDP exemption, exclusion, or waiver.
7. Require any Highway 1-related project, located within or visible from any designated highly scenic area, in or within 500 feet of any environmentally sensitive habitat area, in or within 300 feet of any coastal waters, and in or within one mile of any special community in the coastal zone to provide continuous (real time), comprehensive, and fully transparent monitoring and reporting by an independent monitor.
8. Require any Highway 1-related project, approved by the Commission with any CDP special condition for project site restoration or with any other project mitigation, to submit a project CDP condition compliance report, as applicable (including, but not limited to, reasonably successful completion of all project mitigations), to the Commission and all known interested persons by such specific deadlines as the CDP shall provide.
9. Require that any Highway 1-related project that involves a state or federally listed historic(al) place or structure be performed by qualified workers, with equipment, materials, and under conditions that maintain, preserve, and protect the historic(al) characteristics of historic(al) place or structure, and under continuous supervision by a professional who specializes in the conditions, construction, and/or materials of the historic(al) place or structure.
10. Require any Highway 1-related project that involves a state or federally listed historic(al) place or structure, or that is located within or visible from any designated highly scenic area, in or within 500 feet of any environmentally sensitive habitat area, in or within 300 feet of any coastal waters, and in or within one mile of any special community in the coastal zone to provide the Commission and the public with a regular report, not less than once every five years, about all recommended and performed supplemental actions to maintain, repair, protect, preserve, restore, and/or enhance that historic(al) place or structure.


Please contact Albion Bridge Steward Jim Heid (jim@heidsite.com) if you have any questions about these comments.


Respectfully submitted for the Albion Bridge Stewards, by:  
(with authorized electronic signatures)

  
Annemarie Weibel, P.O. Box 766, Albion, California 95410

  
Arlene Reiss, P.O. Box 431, Albion, California 95417

  
Warren De Smith, P.O. Box 523, Albion CA, 95410

  
Janet Eklund, P.O. Box 186, Albion, California 95410

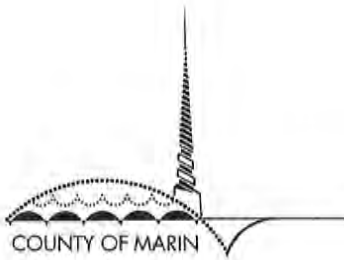
  
Bill Heil P. O. Box 467 Albion, California 95410

  
Ali van Zee, P.O. Box 2022, Fort Bragg, California 95437

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[1] The sole reference in the draft Strategic Plan to Highway 1 occurs on Objective 2.2.4, in the context of “protect and enforce existing public access and recreational opportunities”: “Work with agency partners (e.g. California State Parks, State Coastal Conservancy, Caltrans, local agencies) on addressing increased demand for access-related facilities, including for parking, restrooms, and waste management, at state parks and along California Highway 1 and other coastal roadways”. The only reference to highways occurs in Objective 4.3.1, in the context of “Complete coastal adaptation policy guidance to support and inform LCP updates on addressing sea level rise for residential development and critical infrastructure development, with a focus on transportation networks (e.g., roads, highways, rail), wastewater facilities and stormwater systems”. The draft Strategic Plan contains no goal, objective, or action in relation to any bridge(s).





# BOARD OF SUPERVISORS

February 11, 2020

PRESIDENT

Katie Rice

2<sup>ND</sup> DISTRICT

California Coastal Commission, Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

VICE PRESIDENT

Dennis Rodoni

4<sup>TH</sup> DISTRICT

By email: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)  
Re: California Coastal Commission Strategic Plan 2020-2025  
Public Draft Comments

2<sup>ND</sup> VICE PRESIDENT

Judy Arnold

5<sup>TH</sup> DISTRICT

Dear California Coastal Commission Executive Division:

Damon Connolly

1<sup>ST</sup> DISTRICT

As District 4 Supervisor and representative for Marin County's coast, I respectfully submit these comments for the public draft of your Strategic Draft 2020-2025. My desire to make these comments are both personal and professional. I am fourth generation West Marin resident and Olema has been my home for 27 years. I have dedicated my career to protecting our coast; often partnering with key stakeholders and village community leaders to develop solutions on the most pressing issues facing our California coast.

Matthew H. Hymel

COUNTY ADMINISTRATOR

CLERK OF THE BOARD

It is difficult to measure the impact of our dedicated local village groups. However, our coastal village groups have been leaders in coastal protection and management, even prior to the 1976 California Coastal Act. Like our ranching community's direct involvement in the transformation of the Marin Peninsula into the Pt. Reyes National Seashore, our local village groups were instrumental in the successful passing of 1976 California Coastal Act. Their unique perspective as actual coastal village residents should not be underestimated nor ignored by this plan. Instead, this plan should reflect their direct commitment to developing formidable solutions to issues affecting our Marin County coast.

Diane Patterson

ASSISTANT CLERK OF THE BOARD

Thus, my office is supportive of the comments proposed by local village groups, like those suggested by the Alliance of Marin Coastal Villages (ACMV), Bolinas Public Utilities District (BCPUD), Muir Beach Community Services District (MBCSD), and East Shore Planning Group (ESPG). Please allow me the opportunity to reiterate some their partial comments and include some of my suggested feedback to your plan.

Marin County Civic Center

3501 Civic Center Drive

Suite 329

San Rafael, CA 94903

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[www.marincounty.org/bos](http://www.marincounty.org/bos)

## Alliance of Marin Coastal Villages

Increasing tourism to our communities has these impacts: excessive trash; stress on local water and sanitation systems; the need for more public bathrooms; traffic congestion; traffic-related threats to public safety; noise and disturbance of fragile local ecosystems; and parking challenges for visitors and locals alike. These impacts often exceed the capacity of existing infrastructure and local financial resources. As directed by the Coastal Act, the CCC needs to balance the laudable goal of preserving

public access against these impacts to ensure there is reasonable management of public access, financial resources for impacted communities to retain their special character, and attention to these consequences in connection with new development and other CCC policies.

Thus, in accordance with Coastal Act Section 30253€, we ask that an additional Objective be added to “Coastal Resources – Goal 3 – Protect and Enhance Coastal Resources”:

Objective 3.x Protect the Unique Character of Special Communities and Neighborhoods.

3.x.1 Update LCP guidance on protection of special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

3.x.2 Encourage sensible management solutions and sources of financial support where increased coastal tourism threatens environmental resources, the character of coastal communities, the financial ability of local agencies to serve tourist needs, and/or the visitor experience.

3.x.3 Outreach to coastal communities to promote information sharing on key issues relating to the management of increasing tourism through guidance documents, webinars, and/or workshops.

Like the protections of Objective 3.3 for agriculture (which served as a model for this proposed objective), this Objective would ensure that the CCC and its staff will address these issues protected under the Coastal Act and not otherwise mentioned in the draft Strategic Plan.

These issues are of such importance to our villages and others along the California Coast that they should also be mentioned in the Vision Statement. We propose this addition:

Our Vision:

The California coast is available for all to enjoy through thousands of public accessways to and along the shoreline, a completed California Coastal Trail, a well-supported network of parks and open spaces, and a wide range of visitor-serving facilities, including lower-cost campgrounds, hostels, and hotels. The rich ecological diversity of the coast and ocean, including beaches, rocky shorelines, wetlands, riparian areas, and sensitive terrestrial habitats, is protected and thriving. Scenic rural landscapes are maintained, coastal agriculture is flourishing, the unique characteristics of the special communities and neighborhoods that attract coastal visitors are preserved, and cultural resources are protected...

#### **Bolinas Public Utilities District**

For the town of Bolinas, the Coastal Act’s mandate to protect the special communities and neighborhoods in the coastal zone is of immense importance. In addition to ACMV’s comment letter, we note that although Goal 4 in the Draft Plan

purports to “support resilient coastal communities”, none of the listed objectives revolve entirely around the Commission’s goals of preserving public beaches and enhancing visitor access to the beaches. Admirable as those goals are, we submit that the Commission also must focus attention on the fates of communities, including Bolinas, which front those beaches and attract coastal visitors. For example, an objective should be included in Goal 4 stating that the Commission will seek to help existing coastal communities survive in the face of projected rising sea levels. We acknowledge that this may require the Commission to balance competing provision of the Coastal Act, namely: the protection of beaches vs. the need to protect existing local communities as sea levels rise. Indeed, this is the exact sort of balancing of priorities envisioned by the Coastal Act. Another objective should be included to recognize the need to balance parking access for beach visitors with the protection of the beaches and residential neighborhoods located there. For example, Objective 2.2.3 should specifically include resident permit parking as a recommended option.

#### **Muir Beach Community Services District**

Visitors have always delighted in visiting the coastal towns and villages and now the popularity of this activity has only increased since the advent of social media. Historic visitors’ interest and focus has continues to be on the coastal village experience for which 30253(e) was enacted to protect. But, with the increase in day-use and overnight visitors, comes the additional burden they put on existing water conservation efforts and supplies, trash collection and shoreline cleanup, finite septic capacities, parking limitations, traffic congestion, emergency services, and public safety.

The Coastal Commission needs to interpret the Coastal Act as the balanced document and ideal vision for which it was created, giving equal consideration to those parts of the Coastal Act that support public access to the coast, but without overburdening or endangering the coastal resources and natural environment beyond a reasonable carrying capacity.

#### **East Shore Planning Group**

Indeed, Marshall is a “poster child” for the purposes for which 30253(e) was enacted. Since the narrow-gauge railway from Sausalito opened in the 1870s, Marshall has been a Mecca for tourists seeking the coastal experience of boating, fishing, hunting and enjoyment of the natural beauty, as well as consuming oysters and other locally harvested seafood. The ranches along the shore produce the highest quality organic milk, livestock and cheeses for which the area is renown. The historic buildings, small boatyard and modest coast-side dwellings add to the ambience and character of Marshall and the entire area.

But the area’s increasing popularity, as well as conditions imposed by the Coastal Commission and its staff in connection with coastal development permits, are very real threats to the community’s viability for visitors and residents alike. So it is of vital importance to consider the protection of the coastal resources and the community

character of our villages along with the other resources that the Coastal Act protects, and that should be specified in the Strategic Plan.

#### District 4 Comments

I commend the Commission for adding Diversity, Equity, Environmental Justice, and Tribal Relations as their Goal 5. This goal and set of objectives are consistent with my priorities as District 4 Supervisor; however, I suggest that the Commission consider adding the following objectives:

5.x.1 Streamline permitting processes to increase and expand affordable housing opportunities for our workforce, service workers, emergency responders, rangers, etc.

5.x.2 Develop programs to diversify our coast through low-cost access options including affordable camping

Given the dire need for affordable housing in our Coastal zone, these objectives will help some of our most vulnerable community members. As well, as provide affordable opportunities for visitors from all backgrounds to visit our beaches. Our local economy and schools will ultimately benefit too. They also propel forward the Commission's **Objective 2.3 to Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast.**

In closing, I congratulate the Commission for this Draft Strategic Plan for 2020-2025. It is evident that the California coast faces greater challenges today than ever before, but I look forward to partnering with our local Coastal Commission representatives to advance the goals and objectives presented in this plan. Please feel free to contact me for additional information.

Respectfully,



Dennis Rodoni, District 4  
Marin County Board of Supervisors





February 12, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**RE: California Coastal Commission Strategic Plan Public Review Draft 2020-2025**

The League of California Cities (League) appreciates the opportunity to comment on the California Coastal Commission's (Commission) proposed 2020-2025 Strategic Plan, which seeks to provide a framework of goals, objectives, and actions to set the Commission's priorities for the next five years. The League is writing on behalf of the League's Coastal Cities Group, which is comprised of the 61 cities situated within the territory of the coastal zone. The primary function of the Coastal Cities Group is to serve as a collaborative forum for cities to discuss and work on coastal issues, including collaborating with the Commission.

In response to calls from cities to work with the Commission, the League created the Coastal Cities Group Leadership Committee to work collaboratively with the Commission and serve as regional representatives for coastal cities. Most recently, the Coastal Cities Group Leadership Committee has focused on collaborating with the Commission on issues related to sea level rise, short term rentals, and updating Local Coastal Programs. The Coastal Cities Group appreciates the stakeholder process that the Commission is undertaking and the ability to weigh in on this proposed plan.

**Collaboration**

The Coastal Cities Group Leadership Committee would like to thank the Commission for continuing to recognize the value of collaborating with the League and improving communications with local governments (Objective 6.1.5). The Leadership Committee is looking forward to future Commission and local government workshops (Objective 6.1.5) to address issues of common interest and find solutions that can be mutually beneficial. The Coastal Cities Group Leadership Committee is encouraged to see such an emphasis on working and consulting with local governments throughout the proposed Strategic Plan.

**Communication**

The Coastal Cities Group Leadership Committee appreciates the Commission's efforts to improve communication, increase staff capacity, and create online tools to support local governments in developing and updating Local Coastal Program's (LCP) (Objective 6.2.3). At the Commission's local government workshop in July of last year, the Coastal Cities Group Leadership Committee called upon the Commission to create best practices and increase the Commission staff involvement in LCP's to create clarity and increase trust in the process. The Coastal Cities Group is looking forward to working with the Commission to decrease confusion and create consistency in the approval process.

**Local Coastal Plans**

In that same vein, the Coastal Cities Group Leadership Committee wants to ensure that the scope of LCPs are consistent with the authority given to the Commission under the Coastal Act. Local governments are consistently trying to balance the regulatory and legislative priorities of the state, and

while the Coastal Cities Group supports the reduction of greenhouse gas emissions (GHG) and recognizes the need for affordable housing throughout the state, we would ask the Commission to limit the scope of LCPs to existing state law and the jurisdiction of the Commission (Objective 4.5.3).

### **Sea Level Rise**

The Coastal Cities Group recognizes the imminent threat and challenges that sea-level rise poses to coastal communities. Throughout California, there has been a major effort to develop policies at the local level that account for the potential impacts of sea level rise and the uncertainty regarding the amount and timing of its potential impacts. It is important for the Commission in addressing issues related to sea level rise (Goal 4, Objective 2.6, Objective 7.2.2, and Objective 8.3.1) to remember that the threat of sea level rise facing coastal communities varies by geography and size. A one-size-fits-all approach to addressing sea level rise as it relates to shoreline management adaptation options, such as managed retreat, (Objective 4.3.5 and Objective 4.3.6) does not allow for local solutions tailored to communities specific needs and undermines local decision making authority.

The Coastal Cities Group believes that addressing sea level rise will require a comprehensive approach including allocating additional funding for the Commission and their staff (Goal 1), creating a menu of options or tools to address sea level rise, and funding for coastal cities so they can continue adaptation projects at the local level. It is imperative, as detailed in the Strategic Plan, that the state and local communities continue to work together to develop solutions.

Looking ahead to the next five years, the League and the Coastal Cities Group are looking forward to continuing to collaborate on the most pertinent issues facing California's diverse coastal communities. The Coastal Cities Group and the Commission share the same mission to protect and enhance California's coast and ocean for present and future generations (pg. 7). Again, we appreciate the stakeholder process the Commission has undertaken on this strategic plan and want to serve as a local government resource for the Commission.

If you have any questions, please do not hesitate to contact me at (916) 658-8218.

Sincerely,

A handwritten signature in blue ink that reads "Derek Dolfie". The signature is written in a cursive, slightly slanted style.

Derek Dolfie  
Legislative Representative



February 12, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Via U.S. Mail and email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

Honorable Chair Padilla and Commissioners:

The City of Newport Beach is generally in support of the 2020-2025 Draft Strategic Plan's (Plan) intention to protect and enhance coastal resources; refine the coastal planning and permitting process; improve participation; and enhance information management and E-Government. We strongly support increased funding to modernize the Commission's network and computer systems. Providing copies of all coastal development permits (CDPs), final enforcement actions, and staff reports in a searchable database by address would significantly enhance the efficiency of Commission staff, city and/or county local staff and your constituents, the people of the State. The ability to submit applications electronically, such as CDPs, Local Coastal Program Amendments and Notice of Final Actions, would significantly streamline the process and provide a more user-friendly<sup>1</sup> interface for both Commission staff and applicants. Increased efficiency through appropriate use of technology would allow Commission staff to devote time to pending application and appeals, the core mission of the agency.

The Plan identifies 189 "priority action items" intended to be undertaken in the next five years, organized under nine separate goals related to: Internal Agency Capacity and Effectiveness; Public Access; Coastal Resources; Climate Change and Sea Level Rise; Environmental Justice, Diversity, and Tribal Relations; Coastal Planning and Permitting; Enforcement; Public Presence and Partnerships; and Information Management and E-Government.

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<sup>1</sup> Objective 9.5.2 Make the Commission's CDP application process more user-friendly by updating and standardizing the CDP application process across districts, making the full range of application types available on the website (including for amendments, exemptions, extensions, etc.), providing hyperlinks to guidance on elements of the application (e.g. to standards for geotechnical and biological reports), and developing protocols to receive CDP submittals in electronic formats that facilitate application processing.



## Increased Staffing

One of the priority action items is to increase staffing. This is understandable as the agency is always represented as being under-staffed. Page five of the Plan indicates 156 staff positions have been budgeted since 2015-2016. It also states that in the 1980s the California Coastal Commission had 56 more staff positions. So, for the last thirty years staffing numbers has remained relatively the same.

A case could be made for more staff but is current staff time being prioritized to achieve the core program and *Permanent Responsibilities of the Coastal Commission*? The core program of the Commission includes both the planning and regulatory functions required by the Coastal Act. The Coastal Act is implemented through permitting new development, and assisting local agencies in obtaining certified Local Coastal Programs. The *Permanent Responsibilities of the Coastal Commission* per <https://www.coastal.ca.gov/perresp.html> are defined by “Proposition 20 (Coastal Initiative, 1972), the California Coastal Plan (1975), and the California Coastal Act (1976) all envisioned a permanent, state coastal management agency. **After local coastal programs (LCPs) have been fully certified and local governments have assumed coastal permit issuing responsibilities**, a variety of tasks must be carried out by the Commission on an ongoing basis.” The key word here is AFTER as LCP certifications were meant to be a higher priority for the Commission and subsequently staff.

At present, approximately 87 percent of the geographic area of the coastal zone has local governments issuing coastal permits for local planning and regulation <https://www.coastal.ca.gov/lcps.html>. Therefore, staff must continue to process the remaining 17 percent of the geographic area’s coastal development permits until the remaining LCPs are certified, as well as, development proposed on tidelands, submerged lands, and public trust lands.

## More Presence and Partnerships

Another priority item relates to staff having an increase in Public Presence and Partnerships. A good goal, but what are the existing partnership commitments? Appendix B of the Plan lists Commission staff (156), participating in 76 Interagency Working Groups. This participation includes attending meetings, conferences, reading related work group materials, providing written and oral input on such materials and invariably requires significant staff time.

The Commissioners recognize the amount of time it takes to participate in “extra-curricular” activities as their Commission responsibilities are typically in addition to other regular work commitments. It takes a lot of time to participate in working groups and committees. Is the time staff spends on 76 Interagency Working Groups, time not being spent processing LCP amendments, coastal development permits, or appeals within the legislatively mandated time periods? Public Resources Code (PRC) 30512 provides 90 days for an LCP amendment, with coastal development permits and appeals to be heard within 49 days (PRC 30621). With more staff will there be less pressure to submit a waiver of the 49-day period, less year-long extension requests for processing amendments granted<sup>2</sup> by the Commission, or less requests by staff for applicants to withdraw their respective applications and resubmit them in order to re-start the Coastal “time clock”? Or will more staff be participating in more working groups as identified in

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<sup>2</sup> Pursuant to Section 30512 of the Coastal Act, the Commission must act on land use plan amendments within 90 working days of complete submittal or filing. Pursuant to Section 30513 of the Coastal Act, the Commission must act on implementation plan amendments within 60 working days of filing. Amendments containing both land use and implementation plan components, must be acted upon by the Commission within 90 working days of filing. However, Section 30517 of the Coastal Act and Section 13535(c) of the California Code of Regulations state that the Commission may extend for good cause any applicable time limits for a period not to exceed one year.



Policy 8.1.2 or attending local public planning meetings to fully engage in the local planning process (Objective 6.1.3).

Notwithstanding the importance of PRC Section 30006.3, how can CCC staff act as experts in climate change (Objectives 4.1.2, 4.1.3, 4.1.4); regulators of cannabis and carbon-neutral agriculture (Objective 3.3) and marine aquaculture (Objective 3.4.1); be oil spill responders (Objective 3.7.1), be wildfire prevention planners (Object 3.1.4); and still process Local Coastal Plans, local appeals, local amendments and effectively manage the permanent responsibilities of the California Coastal Commission?

The staff time discussed above does not include staff time spent in meetings between Commission staff and local government staff, applicants, appellants, lobbyists, project supporters and opponents. Meetings are a necessary part of the collaborative process of implementing Local Coastal Programs. Given all the time spent in meetings, isn't there further reason to focus staff priorities on the legislative fundamentals that implement the Coastal Act? The priority should be to get LCPs certified for the remaining jurisdictions, review and process LCP amendments and appeals in a timely manner and enforce the coastal act policies in a timely and expeditious manner.

We appreciate how much staff time and effort has been spent preparing the new 2020-2025 Coastal Strategic Plan but remind the Commission that only 30 of the 163 objectives of the 2013-2018 Plan were completed with the remaining objectives either in-progress or deferred (Coastal Commission Strategic Plan Action Implementation Dashboard - Year 5 - Updated as of January 2019 <https://www.coastal.ca.gov/strategicplan/spindex.html>). It's our understanding that CCC staff are not agents of change but respected civil service employees in an agency with legislatively defined expectations. For the reasons discussed above, the City of Newport respectfully requests the Commission refine the goals and objectives of the 2020-2025 Strategic Plan to prioritize the objectives in-line with legislatively defined expectations.

Sincerely,



Jim Campbell

Deputy Community Development Director

Enc: Permanent Responsibilities of the California Coastal Commission

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<sup>3</sup> PRC 30006.5 The Legislature further finds and declares that sound and timely scientific recommendations are necessary for many coastal planning, conservation, and development decisions and that the commission should, in addition to developing its own expertise in significant applicable fields of science, interact with members of the scientific and academic communities in the social, physical, and natural sciences so that the commission may receive technical advice and recommendations with regard to its decision making, especially with regard to issues such as coastal erosion and geology, marine biodiversity, wetland restoration, sea level rise, desalination plants, and the cumulative impact of coastal zone developments.

## Permanent Responsibilities of the California Coastal Commission

Proposition 20 (Coastal Initiative, 1972), the California Coastal Plan (1975), and the [California Coastal Act](#) (1976) all envisioned a permanent, state coastal management agency. After [local coastal programs](#) (LCPs) have been fully certified and local governments have assumed coastal permit issuing responsibilities, a variety of tasks must be carried out by the Commission on an ongoing basis. The following list includes the major, continuing functions mandated by law and assigned to the Coastal Commission.



### PERMANENT FUNCTIONS:

#### **LCP, Port Master Plan, University Long-Range Development Plan, and Public Works Plan Amendments:**

All amendments to any of these plans must be reviewed and approved by the Commission before they can take effect (Public Resources Code 30514, 30605, and 30716, hereinafter "PRC").

#### **Public Works Plans and University Long-Range Development Plans:**

All of these plans, even after certification of an LCP, must be reviewed and approved by the Commission before they can take effect (PRC 30605 and 30606).

#### **Permit Appeals:**

Certain local government and port district coastal permit actions may be appealed to and must be acted on by the Commission (PRC 30519(a) and (b), 30603, and 30715).

#### **Coastal Permits/Permit Reviews:**

All new development proposed on tide and submerged lands, and other public trust lands must receive a permit from the Commission (PRC 30519(b), and 30416(d)). In addition, new development under public works plans and university long range development plans are reviewed by the Commission (PRC 30606).

#### **Federal Activities:**

Activities authorized, funded or carried out by the Federal Government that affect coastal zone resources must be reviewed by the Commission for consistency with the federally approved California Coastal Management Program, including the Coastal Act (PRC 30330, and 30400). As approved by the Federal Government in 1977, and with relatively minor exceptions, the Commission is the only State agency which can conduct this review of federal projects and activities.

#### **Offshore Energy Projects:**

All offshore oil and gas exploration, including any development on the federal outer continental shelf, must be reviewed by the Commission. Projects in federal waters are reviewed for consistency with California's federally-approved Coastal Management Program (e.g. the California Coastal Act). A 1984 amendment to the Coastal Act requires the Commission to work with the Governor and other agencies relative to offshore oil transportation and refining issues (PRC 30265 and 30265.5). Marine terminals, refineries, oil and gas pipelines, and other energy development in the coastal zone must be regulated by the Commission (PRC 30260–30263).

#### **Oil Spill Program:**

Under the California Oil Spill Prevention and Response Act the Commission was given additional duties, to assist in the implementation of a statewide oil spill prevention and response program for providing the best achievable protection for the state's coastal and marine resources (in coordination with other federal and state agencies). These duties include, but are not limited to: participate in special statewide studies and taskforces investigation programs and other mechanisms for improving oil spill prevention and response in the state;

participate in the development of statewide emergency oil spill response protocol; clarify Commission's role, responsibilities, and permit process in the clean-up of oil spills; review and comment on oil spill related regulations; review facility and vessel oil spill contingency plans; consult on the design, planning, and operation of wildlife rehabilitation facilities; participate in Harbor Safety Committees to improve vessel safety within each of the state's major ports/harbors; and participate in the Area Contingency Planning process to improve regional preparedness for oil spill response.

**Public Access:**

The implementation of a public coastal access program for the length of California's coastline, including maintaining and updating an access inventory, keeping records of easements and dedications, and expediting the opening of new accessways for public use are continuing responsibilities of the Commission (PRC 30530–30534).

**Access Guide:**

The Commission has published and must periodically revise the popular Coastal Access Guide (Ch. 868, Stats, 1979).

**Enforcement:**

The Commission must continue to enforce its permits and other provisions of the Coastal Act (PRC 30800-30824).

**Energy Projects and Public Works:**

Upon request or on its own motion, the Commission may amend a certified LCP to accommodate energy and public works projects if the local government refuses to do so (PRC 30515).

**LCP Reviews:**

At least every five years, each LCP must be reviewed by the Commission to determine whether the program is being effectively implemented in conformity with the Coastal Act (PRC 30519.5).

**Power Plant Siting:**

Every two years, the Commission must update previously adopted maps of areas not suitable for new coastal electric power plants and must participate in Energy Commission decisions relative to other coastal power plant sites (PRC 30413(c) and (d)).

**Guide to Coastal Resources:**

The Commission has published and must periodically revise the Coastal Resource Guide for public use (PRC 30344).

**Public Participation:**

The Commission must make recommendations to state and local agencies to ensure effective public participation in their coastal resources management decisions (PRC 30006 and 30339).

**Wastewater Treatment Works:**

The Commission must review coastal wastewater treatment works (PRC 30412(c)).

**Restoration of Wetlands:**

The Commission must work on and promote wetland restoration (PRC 30231, 30233, and 30411(b) and 30607.1).

**Local Government Costs:**

The Commission must review all local government mandated cost claims resulting from Coastal Act duties and must make grants to local governments, subject to appropriation (PRC 30350–30555 and 30340.5).

**Federal Pass Through Grants:**

The Commission is designated, under the federally approved California Coastal Management Program, as the state agency to receive and pass through federal grants to the San Francisco Bay Conservation and Development Commission and State Coastal Conservancy.

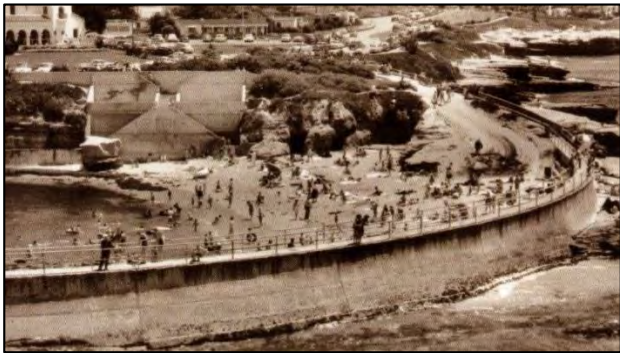
February 12, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**Public Review Draft of the 2020 - 2025 California Coastal Commission Strategic Plan**

My comments are as follows:

The Children’s Pool, located in La Jolla, CA has a neglected beach access ramp which was historically used by the public from roughly the 1940’s through the late 1980’s. In the 1990’s a ramp gate was locked shut by the City and the access ramp was allowed to deteriorate from neglect. This action encroached on public use of the ramp by families with children and the elderly. The gate blocked divers, swimmers and others with limited mobility who cannot use the existing steep and slippery concrete stairs to get to the beach. Adding to this clear Coastal Act violation, in 2015 the City of San Diego, built a new lifeguard tower to improve ADA access to the facility. The City also added a 30” concrete barrier wall below the beach ramp gate to make it impossible to ever use the ramp again.



This violation was first brought to the attention of the City of San Diego about 2010 but they refused to open the gate. In 2016 a complaint was filed with the City after they added the concrete barrier wall.



The City officials falsely claimed that the ramp was only for emergency use and was no longer needed. City officials ignored clear evidence of public ramp use. A letter documenting the violation was sent to the local CCC office where the Enforcement Officer recognized the violation. However, a recent staff report failed to recognize the historic public use of the ramp, conflicts in the Local Coastal Program and other obvious Coastal Act violations. An appeal of the City of San Diego's Substantial Conformance Review of the unpermitted barrier wall at the February, 2020 CCC meeting was postponed. There will be a rescheduled hearing this spring or summer.

This coastal access violation is ongoing for over twenty years.

I reviewed the draft Strategic Plan regarding **Goals, Objectives, and Actions, letter B. Public Access.** *"First, there is an on-going need to insure that public access easements and accessways are open and available to the public". (Objective 2.1)* This section requires maximizing public access and recreation to all. The mandate is to protect *"vertical accessways and support facilities that serve to connect the public to the state's bluffs and beaches"*. It goes further in **Objective 2.2 Protect and Enforce Existing Public Access and Recreational Opportunities.** This section identifies unpermitted development (2.2.1) and taking enforcement action (2.2.2) to ensure that structures that are blocking public access in violation of the Coastal Act are removed and public access restored.

**Objective 2.3 Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast (see also Objective 5.3).** This presents a perfect opportunity for the City and CCC to restore public access to the ramp at Children's Pool. People with limited mobility would be able to access the beach once again and visit the unique underwater reef which is right offshore. There is no other reef, with such a rich ecological diversity, in San Diego so close to a beach with a nearby access ramp. Disabled advocacy groups and veteran's organizations would take advantage of the safe and convenient coastal access for rehabilitating veterans. The community of La Jolla would support the ramp repairs.

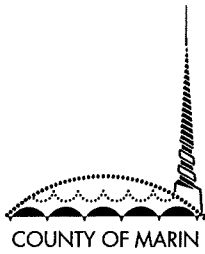
When evaluating the objectives of the Strategic Plan draft and the closed beach ramp, the City of San Diego and the local CCC office staff are in direct contradiction with the Strategic Plan.

The blocked ramp at Children's Pool violates the existing access provisions in the Coastal Act. It is ludicrous to ask for public comment on the Plan when the CCC will not follow through to enforce existing regulations. This public comment period becomes an exercise in futility, when it appears the CCC will only enforce violations on private property and not public property held in trust by a City. If the Coastal Commission is untrue to its ideals, it will be a disgrace to the State of California.

Sincerely,



Marie Hunrichs  
mariehunrichs@cox.net



COMMUNITY DEVELOPMENT AGENCY  
PLANNING DIVISION

Brian C. Crawford  
DIRECTOR

February 12, 2020

Thomas Lai  
ASSISTANT DIRECTOR

California Coastal Commission  
Executive Division  
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[www.marincounty.org/plan](http://www.marincounty.org/plan)

**RE: California Coastal Commission Strategic Plan 2020-2025**

Thank you for the opportunity to provide comments on the California Coastal Commission's 2020-2025 Strategic Plan. We have reviewed the document and support the Commission's goals and objectives for coastal protection. In particular, we appreciate the Commission's efforts to support resilient coastal communities in light of climate change impacts by educating and engaging with local communities, supporting development and implementation of adaptation projects, and collaborating with local governments on Local Coastal Plan updates.

We would also like to express our full support for suggestions contained in correspondence from the Alliance of Coastal Marin Villages (ACMV), which was sent to you under separate cover and is also provided as an attachment to this letter. The ACMV is a coalition of representatives from West Marin's ten villages which meets regularly to discuss issues of common concern. As noted in their letter, both the Coastal Act and Marin County's Local Coastal Plan support the protection of coastal communities that have become visitor destinations in their own right due to their special characteristics and incomparable settings. The impacts of increasing tourism on the character and infrastructure of these villages has been a long-standing concern. Accordingly, we concur with their recommendation to supplement the Strategic Plan goals and objectives related to Coastal Resources to recognize the impacts tourism can bring to coastal villages and the need to protect and preserve the unique character of these special communities in Marin and throughout the Coastal Zone.

In addition, the County of Marin is fully committed to equity in all its planning and actions. We strongly support Goal 5 for advancing diversity, equity, environmental justice, and tribal relations. We suggest you add one other objective in this regard - seeking to develop a better understanding of how those communities use our beaches and coastlines, identifying any impediments to that use, and developing ways to expand their opportunities.

Finally, we would request that guidance documents envisioned by the Strategic Plan be developed collaboratively with local communities to ensure that such guidance reflects community-specific factors and is practical, feasible, and enforceable at the local level, consistent with the explicit authority provided by the State Legislature and the Coastal Act.

Thank you for your consideration of these suggestions and we look forward to continuing our collaborative work with Commission staff during the remainder of Marin's Local Coastal Plan Update process.

Sincerely,

Brian C. Crawford  
Director

Attachment: Alliance of Coastal Marin Villages letter, February 5, 2020

## Alliance of Coastal Marin Villages

February 5, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

By email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

Re: Comments on the Public Review Draft California Coastal Commission Strategic Plan 2020-2025.

Dear California Coastal Commission, Executive Division:

The Alliance of Coastal Marin Villages (“ACMV”) consists of representatives of all the villages located in unincorporated West Marin County that are in the Coastal Zone: Dillon Beach, Tomales, Marshall, Point Reyes Station, Inverness, Inverness Park, Olema, Bolinas, Stinson Beach and Muir Beach. The ACMV formed as a result of meetings convened by Senator Mike McGuire to assess the impacts of (and formulate solutions to) the problems posed by increased tourism to West Marin, which has strained local resources and degraded the coastal visitation experience. The ACMV meets regularly to discuss and address issues of common concern, and on a quarterly basis with Supervisor Dennis Rodoni.

We write today to urge the California Coastal Commission (“CCC”) and its staff to correct an omission in the draft Strategic Plan for 2020 – 2025 (version 12/6/19). The Strategic Plan should include a Goal and several Objectives in accordance with the statutory direction of PRC §30253(e):

*§30253 New development shall do all of the following:*

... .

*(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.*

As stated in Marin County’s Local Coastal Plan with respect to PRC§ 30253: “[t]he intent of this policy is to protect the unique character of existing coastal communities.” Almost all of our villages are special communities that, because of their unique characteristics, are popular visitor destinations. Like similar small villages up and down the California coast, these villages are suffering the consequences of substantially increased numbers of coastal visitors — numbers far greater than when the Coastal Act became law.<sup>1</sup> The villages need protection and relief from the effects of increasing numbers of recreational visitors. The villages face significant financial and logistical challenges to providing services to the additional visitors while at the same time protecting the coastal environment and maintaining their community character. Indeed, it is the very special character of these villages that makes them such popular visitor destinations in the first place.

Increasing tourism to our communities has these impacts: excessive trash; stress on local water and sanitation systems; the need for more public bathrooms; traffic congestion; traffic-related threats to public safety; noise and disturbance of fragile local ecosystems; and parking challenges for visitors and locals alike. Addressing

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<sup>1</sup> The impacts of increased tourism to our area caused the Marin County Board of Supervisors to underwrite a study, AECOM, “West Marin Visitor Needs Assessment” (May 2017), which predicted substantial growth in visitor numbers in the years ahead. Senator Mike McGuire hosted overflow meetings on the subject in Pt. Reyes Station in 2017 and 2019.



these impacts often exceeds the capacity of existing infrastructure and local financial resources. As directed by the Coastal Act, the CCC needs to balance the laudable goal of preserving public access against these impacts to ensure there is reasonable management of public access, financial resources for impacted communities to retain their special character, and attention to these consequences in connection with new development and other CCC policies.

Thus, in accordance with Coastal Act Section 30253(e), we ask that an additional Objective be added to “Coastal Resources – Goal 3 -- Protect and Enhance Coastal Resources”:

**Objective 3.x Protect the Unique Character of Special Communities and Neighborhoods.**

- 3.x.1 Update LCP guidance on protection of special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.
- 3.x.2 Encourage sensible management solutions and sources of financial support where increased coastal tourism threatens environmental resources, the character of coastal communities, the financial ability of local agencies to serve tourist needs, and/or the visitor experience.
- 3.x.3 Outreach to coastal communities to promote information sharing on key issues relating to the management of increasing tourism through guidance documents, webinars, and/or workshops.

Like the protections of Objective 3.3 for agriculture (which served as a model for this proposed objective), this Objective would ensure that the CCC and its staff will address these issues protected under the Coastal Act and not otherwise mentioned in the draft Strategic Plan.

These issues are of such importance to our villages and others along the California Coast that they should also be mentioned in the Vision Statement. We propose this addition:

**Our Vision:**

The California coast is available for all to enjoy through thousands of public accessways to and along the shoreline, a completed California Coastal Trail, a well-supported network of parks and open spaces, and a wide range of visitor-serving facilities, including lower-cost campgrounds, hostels, and hotels. The rich ecological diversity of the coast and ocean, including beaches, rocky shorelines, wetlands, riparian areas, and sensitive terrestrial habitats, is protected and thriving. Scenic rural landscapes are maintained, coastal agriculture is flourishing, the unique characteristics of the special communities and neighborhoods that attract coastal visitors are preserved, and cultural resources are protected. The California Coastal Commission works collaboratively with local governments, other agencies, and an engaged and knowledgeable public committed to coastal stewardship to support and manage environmentally-sustainable development, including assuring priority for coastal-dependent and related uses of land and water, concentrating new growth in existing urban areas, providing multi-modal public access and transportation, and promoting well-adapted, resilient communities in the face of global climate change. The coast endures as a vital part of California’s social and cultural fabric and the coastal and ocean economy is strong.

In closing, the members of the ACMV believes that the failure of the Draft Strategic Plan to specifically include an objective to preserve the special character of coastal communities and neighborhoods is an omission that needs to be corrected, and we respectfully request that the Commission and CCC staff revise the Plan

Letter to California Coastal Commission, Executive Division  
February 5, 2020  
Page Three

accordingly. Please contact me with any questions or if you would like more information about the ACMV. Thank you very much for this opportunity to comment on the Draft Strategic Plan.

Very truly yours,

Jennifer Blackman  
Chair, Alliance of Marin Coastal Villages

cc: Supervisor Dennis Rodoni, Marin County Board of Supervisors, District 4, [droni@marincounty.org](mailto:droni@marincounty.org)  
Senator Mike McGuire, California State Senate, District 2, [senator.mcguire@senate.ca.gov](mailto:senator.mcguire@senate.ca.gov)  
Assemblymember Marc Levine, California State Assembly, District 10, [assemblymember.levine@assembly.ca.gov](mailto:assemblymember.levine@assembly.ca.gov)

Steve Padilla, Chair, California Coastal Commission, [Steve.Padilla@coastal.ca.gov](mailto:Steve.Padilla@coastal.ca.gov)  
Donne Brownsey, Vice Chair, California Coastal Commission, [Donne.Brownsey@coastal.ca.gov](mailto:Donne.Brownsey@coastal.ca.gov)

Sara Aminzadeh, Commissioner, California Coastal Commission, [Sara.Aminzadeh@coastal.ca.gov](mailto:Sara.Aminzadeh@coastal.ca.gov)  
Dayna Bochco, Commissioner, California Coastal Commission, [Dayna.Bochco@coastal.ca.gov](mailto:Dayna.Bochco@coastal.ca.gov)  
Linda Escalante, Commissioner, California Coastal Commission, [Linda.Escalante@coastal.ca.gov](mailto:Linda.Escalante@coastal.ca.gov)  
Carole Groom, Commissioner, California Coastal Commission, [Carole.Groom@coastal.ca.gov](mailto:Carole.Groom@coastal.ca.gov)  
Dr. Caryl Hart, Commissioner, California Coastal Commission, [Caryl.Hart@coastal.ca.gov](mailto:Caryl.Hart@coastal.ca.gov)  
Erik Howell, Commissioner, California Coastal Commission, [Erik.Howell@coastal.ca.gov](mailto:Erik.Howell@coastal.ca.gov)  
Katie Rice, Commissioner, California Coastal Commission, [Katie.Rice@coastal.ca.gov](mailto:Katie.Rice@coastal.ca.gov)  
Effie Turnbull-Sanders, Commissioner, California Coastal Commission, [Effie.Turnball-Sanders@coastal.ca.gov](mailto:Effie.Turnball-Sanders@coastal.ca.gov)  
Roberto Uranga, Commissioner, California Coastal Commission, [Roberto.Uranga@coastal.ca.gov](mailto:Roberto.Uranga@coastal.ca.gov)  
Mike Wilson, Commissioner, California Coastal Commission, Mike. [Wilson@coastal.ca.gov](mailto:Wilson@coastal.ca.gov)

**From:** [Jespersion, Michelle@Coastal](mailto:Jespersion.Michelle@Coastal)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** FW: Public Comment on February 2020 Agenda Item Wednesday 6e - California Coastal Commission Public Review Draft Five-Year Strategic Plan (2020 - 2025)  
**Date:** Friday, February 14, 2020 10:56:19 AM

---

**From:** ExecutiveStaff@Coastal  
**Sent:** Wednesday, February 12, 2020 11:43 AM  
**To:** Jespersion, Michelle@Coastal <Michelle.Jespersion@coastal.ca.gov>  
**Subject:** FW: Public Comment on February 2020 Agenda Item Wednesday 6e - California Coastal Commission Public Review Draft Five-Year Strategic Plan (2020 - 2025)

---

**From:** [melnutter@verizon.net](mailto:melnutter@verizon.net) [<mailto:melnutter@verizon.net>]  
**Sent:** Wednesday, February 12, 2020 11:01 AM  
**To:** ExecutiveStaff@Coastal  
**Subject:** Public Comment on February 2020 Agenda Item Wednesday 6e - California Coastal Commission Public Review Draft Five-Year Strategic Plan (2020 - 2025)

I am submitting this comment on behalf of Amigos de Bolsa Chica.

One area of concern and of paramount interest to Amigos de Bolsa Chica in the draft Strategic Plan is not mentioned with specificity. Although several objectives to promote the overall policy to "Protect and Enhance Coastal Resources" are set forth starting on Page 15 of the document, the importance of maintaining the areas we have already preserved in California should be emphasized. The resources we have saved and need further protection, also need to be maintained. For instance, saving the Bolsa Chica Wetlands and protecting them from incompatible uses may prove of little value if we fail to do what is required to maintain them as a healthy functioning wetland resource in the future. Acquiring areas of ecological importance are likely to capture headlines, but proper stewardship and maintenance is critical.

Melvin L. Nutter  
Attorney at Law  
5730 E. Deborah St.  
Long Beach, CA 90815-1308  
(562) 833-8692



Central Coast Alliance United for a Sustainable Economy

# CAUSE

regional power in action

February 13, 2020

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**Lucia Marquez**

Policy Advocate

**Alejandra Melgoza**

Community Organizer

**Abe Melendrez**

Policy Advocate

**Tania Reyes**

805 Undocufund Coordinator

**Frank Rodriguez**

Policy Advocate

California Coastal Commission

Executive Division

45 Fremont Street, Suite 2000

San Francisco, CA 94105

Thank you for the opportunity to submit comments on the California Coastal Commission 2020-2025 Strategic Plan. The Central Coast Alliance United for a Sustainable Economy (CAUSE) is a base-building organization committed to social, economic and environmental justice for working-class and immigrant communities in Ventura and Santa Barbara Counties. We have worked for many years at the nexus of coastal issues and environmental justice. After our efforts to provide feedback on and support the Commission's Environmental Justice Policy adopted last year, we submit the following comments to ensure strong implementation of the Environmental Justice Policy in the Commission's upcoming Strategic Plan.

*Comments on Goal 5: Advance Diversity, Equity, Environmental Justice and Tribal Relations*

CAUSE supports the draft Strategic Plan language on meeting accessibility, multilingual and multimedia communication, partnerships with CBO's, staff diversity and equity training. We believe Goal 5 can be strengthened with greater emphasis on incorporating environmental justice in permit decisions, planning documents, and reaching diverse populations in Objective 5.1 and 5.3.

*Comments on Objective 5.1 Strengthen Coastal Protection through Consideration of Environmental Justice in Permit Decisions and Planning Documents.*

We applaud the important objective of developing clear guidance for staff to identify environmental justice issues in permit applications. This has been a challenging task as the Environmental Justice Policy is new to the Commission, staff, applicants, and community stakeholders, resulting in frequent debates over the definition of environmental justice and whether a project truly has environmental justice impacts. **Because of this confusion and to avoid the misuse of environmental justice, we believe the Strategic Plan would benefit from more specificity about what type of issues should be included in this guidance.** In particular, we suggest this guidance should include an **assessment of disadvantaged communities using Cal EnviroScreen and other criteria who could be disproportionately affected by pollution or other health impacts as a result of a project in the coastal zone which diminishes their healthy access to the coast, or who would be impacted by displacement or otherwise blocked from coastal access by new development proposals or restrictive policies.** Furthermore, identifying environmental justice issues must also be accompanied by assessing impacts, mitigations and alternatives, including no project alternatives. The Commission's Strategic Plan should include **guidance for staff not just in how to identify environmental justice issues, but how to develop mitigations and alternatives.**



*Comments on Objective 5.3 Reach Diverse New Audiences and Promote Equity and Inclusion.*

We support the goal to conduct or attend community workshops on relevant coastal-related issues, as informal workshops can often be more accessible ways for community members to participate than official Commission meetings. In alignment with the Commission's Environmental Justice Policy, we also **encourage the use of proactive engagement methods such as presenting at community meetings, conducting door-to-door surveys or other outreach in impacted neighborhoods, and holding focus groups with populations facing barriers to participation on issues related to environmental justice.** We recommend the Commission seek **funding specifically for diverse and inclusive public engagement** through either additional staffing or funded partnerships with CBO's.

We additionally appreciate the objective to promote equity and inclusion within the Commission's WHALE TAIL Grants Program. The California Association of Nonprofits' 2019 *Causes Count* report showed that nonprofits in communities of color receive approximately half of the revenue per person than nonprofits in other parts of the state, a disparity which has widened since 2012. We believe the Commission's efforts should begin with an **equity analysis of the Commission's existing grant funding and recipients**, as well as an analysis of **potential measures that could reduce barriers to applicants from marginalized communities**, such as technical assistance in grant applications. We recommend looking to the State Coastal Conservancy's current draft JEDI Guidelines, which contain strong examples of ways to reduce barriers to applying for grant funding in order to advance equity.

*Comments on Goal 4: Supporting Resilient Coastal Communities in the Face of Climate Change and Sea Level Rise*

In this section, there is unfortunately **no mention of the disproportionate impacts of climate change to vulnerable populations.** Working-class communities and communities of color disproportionately have toxic sites and heavy industrial facilities on their coasts at risk of flooding, face risks of economic displacement due to lack of insurance or other safety nets, depend on jobs that will be negatively impacted by disruption to coastal economies, depend on groundwater aquifers that will be impacted by saltwater intrusion, and more. This section should include an Objective focused on climate justice and building resilience for communities that will be disproportionately impacted by climate change. **This objective could include assessment of sea level rise risks to disadvantaged communities, analysis of sea level rise adaptation strategies based on positive and negative impacts on equity, and guidance to assist local governments in understanding the unique risks of sea level rise on marginalized communities and best practices to build equity into climate resilience strategies.**

*Comments on Goal 2: Maximize Public Access and Recreation for All*

We recommend the Commission **include a new objective to address the impacts of California's housing crisis on coastal access.** The housing crisis is affecting coastal access in several ways, including the displacement of lower income residents and people of color to inland communities where the coast is less accessible, the sharp increase of homelessness in public beaches as need rises beyond the capacities of shelters, and growing demand to develop new housing in the coastal zone. In its Strategic Plan, the Commission should **explore ways to encourage the creation and preservation of affordable housing in the Coastal Zone within the Commission's existing authority, while seeking legislative changes to expand the Commission's authority to incentivize or require affordable housing.** The Commission should also **work with local stakeholders to develop solutions that uphold the rights and dignity of unsheltered persons while promoting coastal access for all beach users.**

We appreciate the Commission's responsiveness to community input and prioritization of environmental justice. Thank you to the staff and Commission for their work on this draft Strategic Plan and we look forward to the implementation of the Environmental Justice Policy through these strategic initiatives.

Sincerely,

A handwritten signature in black ink that reads "Maricela Morales". The signature is written in a cursive, flowing style with a large initial "M" and a decorative flourish at the end.

Maricela Morales  
Executive Director  
CAUSE

**DEPARTMENT OF TRANSPORTATION**

Division of Environmental Analysis

1120 N St, MS-27

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Making Conservation  
a California Way of Life.

February 13, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Dear California Coastal Commission:

Thank you for the opportunity to comment on the Public Review Draft of the 2020-2025 California Coastal Commission Strategic Plan (Draft Strategic Plan). The California Department of Transportation (Caltrans) and the California Coastal Commission (Commission) have a long history of working together effectively to protect natural resources and provide safe multi-modal transportation and access to California's coastline. The goals that have been identified in previous Strategic Plans for both agencies complemented and mutually reinforced each other, and we are encouraged to see in the Draft Strategic Plan that our interagency partnership and areas of collaboration continue to form important parts of the Commission's goals, objectives, and actions going forward into 2025.

In our following comments, we want to highlight synergies within the Draft Strategic Plan and the recent Caltrans / Commission Director's meeting held between Coastal Commission and Caltrans agency leadership; opportunities to deliver on goals and recommendations coming out of the Assembly Bill (AB) 1282 Transportation Permitting Task Force (AB 1282 Task Force); and several specific opportunities to enhance the Draft Strategic Plan.

The recently held Caltrans / Commission Director's meeting provided agency leadership the opportunity to reflect on and discuss the deep commitment both agencies have for successful collaboration, as well as opportunities for focused partnership going forward. There is good alignment in the Draft Strategic Plan in terms of characterizing how our Interagency Agreement supports projects and plans achieving consistency with the California Coastal Act (Action 8.1.7). A general need for robust, early coordination for successfully permitted projects was discussed at the Caltrans / Commission Director's meeting—a goal shared by the AB 1282 Task Force—and Caltrans looks forward to partnering with the Commission in implementing those recommendations. A closely related aspect of improved partnering includes increasing Commission staff resources, which is

a direct outcome of our Interagency Agreement, and Caltrans affirms our support of this action (Action 1.1.1).

Caltrans also appreciates the Draft Strategic Plan's specific actions to increase multi-modal transportation and reduce vehicle miles traveled (Actions 2.3.1, 2.5.1, and 4.5.4), as well as actions to expand the California Coastal Trail (Actions 2.5.1, 2.5.2, and 2.5.4). These actions align well with priorities for Caltrans to increase pedestrian, bicycle, and public transportation options. Caltrans also shares the Commission's objective in developing advance mitigation solutions (Actions 3.2.2, 3.2.3, and 3.2.4), and observes that there are good synergies with AB 1282 Task Force recommendations to expand the use of permitting tools that support project-specific flexibility.

Caltrans is also deeply committed to Goal 4 in addressing climate change risks, including sea level rise, and planning for adaptation for transportation infrastructure (Actions 4.1.2, 4.1.3, 4.1.4, 4.1.5, and 4.3.1). It is a priority for Caltrans to innovate and "counter the business as usual mindset" in developing new solutions for major issues like climate change; we are committed to advancing the use of digital technologies, such as geospatial mapping, to enhance decision-making and program implementation and look forward to supporting data-sharing activities (Actions 9.6.1, 9.6.2, and 9.6.4).

Building on these shared synergies characterized within the Draft Strategic Plan, Caltrans has the following specific suggestions:

- Include reference to other regional partners (such as Regional Transportation Planning (RTPs) agencies, Metropolitan Planning Organizations (MPOs), and Transit Districts) that fund, own and operate many transportation systems relevant to Actions 2.2.4, 2.3.1, 2.5.2, 4.1.5, and 4.2.4. Inclusion of these essential partners to enhance transit services is highlighted by the AB 1282 Task Force for effective coordination.



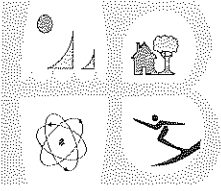
- Suggest for Action 4.2.4 to change "monitor" to "facilitate".
- Broaden Action 6.3.1, or add a new Action, to develop and implement programmatic approaches for efficient permit processing. A desire for design guidance for similar projects / common issues was discussed at the Caltrans / Commission Director's Meeting and is also identified within recommendations by the AB 1282 Task Force.
- Suggest addition of safety within Action 2.2.4, it is a priority for Caltrans to ensure projects provide safe access.
- For Appendix B, add AB 1282 Task Force.

Any questions or requests for clarification on any comments provided should be directed to myself or Kate Anderson, Coastal Program Manager, within the GNEIS Office in the Division of Environmental Analysis at (916) 653-5308 or by email <kate.anderson@dot.ca.gov>.

Sincerely,



SCOTT WILLIAMS  
Office Chief, GNEIS  
Division of Environmental Analysis  
1120 N Street, MS 27  
(916) 653-8369  
(916) 216-2741 (Cell)  
scott.m.williams@dot.ca.gov



# City of Huntington Beach

2000 MAIN STREET

CALIFORNIA 92648

## DEPARTMENT OF COMMUNITY DEVELOPMENT

Planning Division

714.536.5271

Code Enforcement Division

714.375.5155

Building Division

714.536.5241

February 13, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Submitted via email to: [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

### **RE: CITY OF HUNTINGTON BEACH COMMENTS ON CALIFORNIA COASTAL COMMISSION DRAFT 2020-2025 STRATEGIC PLAN**

To whom it may concern,

Thank you for the opportunity to submit comments on the Draft California Coastal Commission (CCC) 2020-2025 Strategic Plan. The City of Huntington Beach appreciates CCC's public outreach efforts for this process and offers the following comments and concerns for your consideration.

#### General Comments

Section III Goals, Objectives, and Actions notes that actions will be tracked and reported to the Commission and the public on an annual basis for the 5-year timeline. The City of Huntington Beach requests to be notified of all Strategic Plan updates and information in order to be an active participant in the process. As a stakeholder, the City has an express interest in the success of the Strategic Plan and its effective implementation.

The need for funding to increase staffing levels and training is highlighted throughout the Strategic Plan. The City supports this objective, especially as it pertains to processing LCP Amendments and LCP Updates.

#### D. Climate Change and Sea Level Rise

Objective 4.3.1 – This action should be more specific regarding the kind of policy guidance that will be considered for residential development. Given the state's aggressive housing production goals, will future policy guidance explore the use of adaptive design measures for residential development to address sea level rise?

Objective 4.5.3 – This action is too vague and should be more specific in what type of policy guidance would be contemplated for affordable housing and increased housing density. In addition, a new objective and action should be added to address conflicts in how the Commission prioritizes residential uses. Policy guidance should be developed to ensure that the Commission will be supportive of and assist (through LCP amendments) local governments in planning for residential uses in the coastal zone in order to meet state housing mandates. The guidance should acknowledge the competing policies regarding sea level rise and lower cost visitor serving accommodations/short term rentals that can be an impediment to planning for residential development in the coastal zone and commit the Commission to working with local governments to reach attainable and realistic solutions. This new objective may be more appropriate for inclusion under goal F. Coastal Planning and Permitting.

#### F. Coastal Planning and Permitting

Objective 6.2.1 – Provide details on the types of guidance to be developed for local governments to certify new LCPs and LCP Updates and integration of Areas of Deferred Certification into existing LCPs. This can include approval process flowcharts, application checklists, providing application forms, hosting training events/webinars, and developing an online page similar to the existing page for Coastal Development Permit Applications and Appeal Forms. Additionally, a specific list of items that are “good cause” for a one year extension to act on LCP applications should be provided in the Strategic Plan. This also furthers the Strategic Plan’s objective to improve communication with local governments.

#### I. Information Management and E-Government

Objective 9.5.2 - The City suggests this be replicated to apply the same user-friendly CDP application process to LCP Amendment submittals. This would complement Objective 9.5.6 to develop a tool to provide information regarding the status of LCP Amendments online.

#### Conclusion

Overall, the City is supportive of most of the goals, objectives and actions as proposed in the draft Strategic Plan. The suggestions noted in this letter emphasize the objectives and actions related to furthering the success of state and local partnerships that are proposed throughout the document. These suggestions also directly further the following Strategic Plan Core Values Guiding Implementation:

**Excellence:** Commission staff members are professionals seeking to be effective and efficient.

**Teamwork:** The Commission embraces teamwork within the agency and with outside entities, recognizing that teamwork is essential to producing excellent work.

Thank you for the opportunity to comment on the Draft CCC 2020-2025 Strategic Plan.

Sincerely,

A handwritten signature in cursive script that reads "Nicolle Aube".

Nicolle Aube, AICP  
Associate Planner

c: Ursula Luna-Reynosa, Director of Community Development  
Jennifer Villasenor, Deputy Director of Community Development  
Jane James, Planning Manager





**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL OCEAN SERVICE**

**Greater Farallones National Marine Sanctuary**

991 Marine Dr., The Presidio  
San Francisco, CA 94129

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

February 13, 2020

**Sent Via Email:** [StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

**RE: Comments on the Public Review Draft of the 2020-2025 California Coastal Commission Strategic Plan**

Dear California Coastal Commission Staff:

Greater Farallones National Marine Sanctuary (GFNMS or sanctuary) has reviewed the Public Review Draft of the 2020-2025 California Coastal Commission (CCC) Strategic Plan (Draft Strategic Plan). We appreciate the opportunity to provide comments during the public review period and recognize the important work the CCC is doing to build upon your previous strategic plan, especially by incorporating a more robust vision for the “dynamic imperatives” of climate change and sea level rise.

GFNMS is a place of special significance, which was designated to protect its ecological and cultural integrity for current and future generations. GFNMS manages the waters and submerged lands off the coast of San Mateo, Marin, Sonoma and Mendocino counties as well as the waters surrounding the Farallon Islands. As such, GFNMS has a mandate under the National Marine Sanctuary Act (NMSA) to protect the resources and habitats of the sanctuary and offers the following comments on the project with respect to our regulations and policies. Our strength in fulfilling this mandate does not only come from the actions related to managing the sanctuary and enforcing our laws and regulations. We are conveners of many processes that produce plans, research, outreach and resource management initiatives that we build on with stakeholder input, community outreach and partnerships with agencies and organizations.

While many of the priority goals and actions discussed in the Draft Strategic Plan have a nexus to activities that overlap with the sanctuary’s jurisdiction, GFNMS staff has not had adequate time to thoroughly review all sections of the document. The process to update the CCC’s Draft Strategic Plan was only recently brought to our attention in the context of an inter-agency sediment management meeting last week and, therefore, we are focusing our comments solely on the objective/actions in the plan that relate to sediment management.

GFNMS applauds the CCC for including a more robust approach to climate change adaptation planning with the addition of Objective 3.6, “Advance Sediment Management Planning Through Interagency Coordination, Research, and Policy Guidance.” As noted above, the CCC has become a participating member agency in a newly formed regional sediment management body, called the North-central California Coastal Sediment Coordination Committee (Sediment Coordination Committee), which was initiated in the Fall of 2019. The Sediment Coordination Committee is a

group of 14 federal, state, and local agencies, including GFNMS as a member of the steering committee, committed to collaborating on coastal resilience initiatives across the region. This committee is looking to build upon previous sediment planning efforts, such as the California Coastal Sediment Management Workgroup (CSMW), and many of the participating agencies have previously contributed to the development of the various Coastal Regional Sediment Management Plans/Report (CRSMP/Rs) that comprise the CSMW's Sediment Management Master Plan ("Sediment Master Plan" or "SMP"). The Sediment Coordination Committee supports coastal resiliency by striving for consensus-driven recommendations for sediment management actions along the coast of Sonoma, Marin, San Francisco, and San Mateo counties. The objectives of the Sediment Coordination Committee are consistent with actions 3.6.1 through 3.6.4 discussed in the Draft Strategic Plan, including developing guidance on sediment management to address ecological concerns and monitoring needs, identifying locations or opportunities where sediment management programs may be used to restore habitat, continuing to develop and strengthen interagency planning efforts on sediment management, and working with Caltrans (who is a member agency of the Sediment Coordination Committee) and other local agencies to encourage beneficial reuse. As such we would recommend that the Draft Strategic Plan include reference to the Sediment Coordination Committee (both under Objective 3.6.3 and in Appendix B) and as another interagency planning effort the CCC can work with to more effectively achieve these actions.

GFNMS commends efforts of the California Coastal Commission in providing a draft report with clear objectives, targets and actions related to sediment management. We look forward to working with you as an active partner and appreciate this opportunity to comment on the Strategic Plan. Please contact me or Max Delaney at 415-970-5255 or [max.delaney@noaa.gov](mailto:max.delaney@noaa.gov) if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Maria Brown". The signature is written in a cursive, flowing style.

Maria Brown, Superintendent, Greater Farallones National Marine Sanctuary

**From:** [Carolyn Chase](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Comments on the 2020-2025 Strategic Plan  
**Date:** Thursday, February 13, 2020 10:42:50 PM

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Please consider changes based on the following 7 comments.

1. Under Objective 4.4 DRAFT: 4.4.2 Use best available science and information (such as the [Conserving California's Coastal Habitat](#) report) to develop guidance on climate change adaptation strategies for providing/maintaining open space areas where ESHA, wetlands and other critical coastal habitats (e.g., beaches, dunes) can migrate.

COMMENT: Add "acquiring" as in, "...providing/maintaining and acquiring' open space areas....

Without acquisitions, they will either migrate on their own, or disappear

2. Under Objective 4.4

DRAFT: 4.4.3 Continue to incorporate economic data and valuation methods into development of appropriate mitigation for unavoidable impacts of permitting shoreline armoring on sand supply, public access/recreation and habitat/ecological function.

COMMENTS: This objective is vague. What kind of "economic data" what kind of "valuation methods"? To serve what ends? This should explicitly include methods that provide economic value to ecological and protective functions that are always undervalued or ignored in most economic methodologies.

3. Under **Objective 2.3 Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast**

Please add 2.3.4 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

4. **Objective 2.4 Encourage Lower-Cost Visitor-Serving Opportunities and Facilities.**

Please add 2.4.3 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

5. RE: **Objective 4.6 Increase Public Awareness and Participation in Planning to Address Climate Change in Coastal Communities and Statewide.**

4.6.1 Increase the public's awareness of climate change issues, including

greenhouse gas emissions, increased wildfire risks, saltwater intrusion, marine heat waves, ocean acidification, and flooding, through such means as public education, social and print media coverage and updates to the Commission's sea level rise website pages

Please add free public events, i.e.

“... through such means as public education, including free public events, social and print media coverage and updates to the Commission's sea level rise website pages”

6. RE: 8.3.3 Improve and expand outreach, communications, and program delivery to diverse new audiences and communities using online platforms, video, and other tools for public education purposes.

Please add events i.e.

8.3.3 Improve and expand outreach, communications, and program delivery to diverse new audiences and communities using online platforms, video, and other tools for public education purposes, including free public events.

7. RE: **Objective 8.4 Engage the Public, Organizations, and Interested Parties in the Stewardship of Coastal Resources.**

8.4.1 Promote broad public engagement and inclusion in Commission coastal stewardship programs through outreach to new audiences, including expanding programs into new geographic areas (for example, Coastal Cleanup Day, Adopt-A-Beach, Schoolyard Cleanups, King Tides Project, Boating Clean and Green, WHALE TAIL® grants).

Please add “Earth Day” in the examples i.e. (for example, Coastal Cleanup Day, Earth Day, etc.)

Carolyn Chase  
San Diego CA 92109



**From:** Penny Elia

**To:** Coastal Strategic Plan Comments

**Cc:** Gray, Shana@Coastal; Parry, Chris@Coastal; Hansch, Susan@Coastal

**Subject:** Comments: 2020-2025 Strategic Plan Update

**Date:** Friday, February 14, 2020 8:01:32 AM

**Attachments:** Strategic Plan Testimony.docx

PennyEliaW6e\_ Strategic Plan.ppsx

During budget review I presented the concept of Public Education forming a 501c3 in order to accept large donations and provide not only a tax deduction to the donor, but also avoid paying fees to those that are currently collecting contributions to Public Education. This idea was not met with much enthusiasm, so I have another suggestion.

The California Office of Tourism is a department within the Governor's Office of Business and Economic Development that supports the promotion of California as a global tourism destination and provides information services to visitors.

The Office of Tourism works in close coordination with the California Travel and Tourism Commission, doing business as Visit California, to facilitate travel to California.

Visit California is a nonprofit 501(c) corporation with a mission to develop and maintain marketing programs – in partnership with the state's travel industry.

Visit California operates a global marketing program in 14 markets on **behalf of the tens of the thousands of California businesses who benefit from travel. The Office of Tourism collects the fees that fund Visit California's campaigns and initiatives.**

California businesses participating in the program are identified as part of five travel and tourism industry categories: accommodations; attractions and recreation; restaurants and retail; transportation and

travel services; and passenger rental cars. The Office of Tourism manages the Tourism Assessment Program and **collects the funds that power Visit California's global marketing efforts.**

With this in mind, let's take a look at the type of revenue we're talking about related to California's oceans, and why Visit California has so many millions of dollars to work with.

While there are millions of dollars spent on "marketing" for accommodations, attractions, restaurants, transportation, and rental cars, there is nothing allocated for visitor education related to the protection and preservation of our coastal resources. The visitor industry is conspicuously absent from Coastal Cleanup Day and Adopt-A-Beach efforts.

Here are the two state industry leaders that I reached out to, along with many other local travel and tourism and visitor and convention bureau leaders. I truly believe at this point in my life that I am not the right person for this outreach, but that Commission staff would be quite persuasive in helping this multi-billion dollar industry understand the need for them to participate as a partner given the huge amount of revenue derived from our coastal resources.

A few of comments on Coastal Cleanup Day's current sponsors – a topic I have been addressing with Commission's Public Education staff for at least 15 years. While Union Bank may have a great green program, long-time sponsors like Crystal Geyser need to go. Besides the impact from all of the plastic water bottles they provide for Coastal Cleanup Day, they are contributing to the pollution of our state's ecosystem. There are far superior methods of providing drinking water to our volunteers on Coastal Cleanup Day and I have shared many ideas with staff over the years.

In closing, I want to let the Commissioners know that I am always here to help. I have offered my assistance to Commission staff many times, and offer it once again. Thank you for your time and any thoughts you may have on how to make these important partnerships with other state agencies work.

# 2020 – 2025 Strategic Plan

*8.4.3 Maintain and expand program capacity for the WHALE TAIL® grants program, California Coastal Cleanup Day, and other education programs by working with partners to develop new funding sources and partnerships, and position the program to maximize philanthropic opportunities.*





## Welcome

The California Office of Tourism is a department within the [Governor's Office of Business and Economic Development](#) that supports the promotion of California as a global tourism destination and provides information services to visitors. The Office of Tourism works in close coordination with the California Travel and Tourism Commission, doing business as Visit California, to facilitate travel to California.

Visit California is a nonprofit 501(c) corporation with a mission to develop and maintain marketing programs – in partnership with the state's travel industry – that keep California top-of-mind as a premier travel destination. Visit California operates a global marketing program in 14 markets on behalf of the tens of the thousands of California businesses who benefit from travel. The Office of Tourism collects the fees that fund Visit California's campaigns and initiatives.

## California Office of Tourism

### Official Business

#### What does the California Office of Tourism do?

The California Office of Tourism supports California programs that benefit the state's travel and tourism industry.

#### Tourism Assessment Program

The California Tourism Marketing Act of 1995 enabled the state's tourism industry to assess itself to conduct statewide marketing. In 1998, the industry voted to pass the first industrywide referendum, creating the Tourism Assessment Program and establishing the California Travel and Tourism Commission as the first-of-its-kind destination marketing organization in the nation.

California businesses participating in the program are identified as part of five travel and tourism industry categories: accommodations; attractions and recreation; restaurants and retail; transportation and travel services; and passenger rental cars. The Office of Tourism manages the Tourism Assessment Program and collects the funds that power Visit California's global marketing efforts. For more information on Visit California, visit [industry.visitcalifornia.com](http://industry.visitcalifornia.com).

#### California Welcome Centers

The California Welcome Center Program comprises 17 strategically located official state welcome centers that serve as California's concierges. Equipped with comprehensive informational materials and expert staff, each California Welcome Center (CWC) acts as a window into the world of the surrounding region and state. Through personal interactions with travelers, CWCs gather travel statistics and feedback on traveler experiences, directly supporting local communities through travel recommendations and insights. For more information on California Welcome Centers, visit [www.visitcwc.com](http://www.visitcwc.com).

Tourism Spending Increases To \$140.6 Billion In  
2018, Driving California's Economy And Supporting  
Nearly 1.2 Million Jobs



**ABOUT VISIT CALIFORNIA:**

*Visit California is a nonprofit organization with a mission to develop and maintain marketing programs – in partnership with the state's travel industry – that keep California top-of-mind as a premier travel destination. According to Visit California, spending by travelers totaled \$140.6 billion in 2018 in California, generating nearly 1.2 million jobs in the state and \$11.8 billion in state and local tax revenues.*

### Ocean Economy

**2013 County Ocean Sector GDP \$3.8 B**

**2013 Major Ocean Economic Sectors**

Tourism & Recreation GDP	\$2.0 B
Transportation GDP	\$1.6 B
Minerals GDP	\$0.04 B

**10%**

of State Ocean Sector GDP

Source: National Ocean Economics Program, 2016

Orange County is famous for its tourist locations and miles of uninterrupted beaches and recreational assets. The ocean economy is the fourth largest in the state and accounts for 10% of the State's total ocean sector gross domestic product (GDP). More than half of the county's ocean economy is associated with beach tourism and recreation. In turn, this makes the ocean economy susceptible to the vulnerabilities associated with rising sea levels.

### Ocean Economy

**2013 County Ocean Sectors GDP \$15.9 B**

**2013 Major Ocean Economic Sectors**

Transportation GDP	\$6.40 B
Tourism and Recreation GDP	\$2.20 B
Minerals GDP	\$0.48 B

**43%**

of State Ocean Sector GDP

Source: National Ocean Economics Program, 2016

Los Angeles County is the largest ocean economy in the state, accounting for 43% of the state's total ocean sector gross domestic product (GDP). The Ports of Los Angeles and Long Beach are two of the busiest ports in California and the U.S. More than 40% of all imports arriving in the U.S. come through the Ports of Los Angeles and Long Beach [1], making the stability of these ports incredibly important to the U.S. economy. The tourism economy is also vital to LA County; certain assets that support tourism and recreation in the county (i.e. beaches) could be negatively impacted by rising sea levels without efforts to prepare and adapt.



PRESIDENT & CEO

## Caroline Beteta

Caroline Beteta serves as president & CEO of the industry-led Visit California, a nonprofit organization created to market California as a premier travel destination to increase the state's share of tourism-related revenues. She simultaneously serves as the Director of Tourism in California's Governor's Office of Business & Economic Development (GO-Biz). Beteta is responsible for implementing Visit California's \$131 million global marketing program and serves as the lead spokesperson for California's \$140.6 billion travel industry. She has shepherded the growth of Visit California into a global marketing franchise delivering millions of visitors and billions of dollars of economic growth to the state every year.

Caroline has served as Chair of the Board and Vice Chair of Operations for Brand USA, where she provided strategic direction for the \$200 million global program. During a two-year term as National Chair of the U.S. Travel Association, she guided the successful merger of the Travel Industry Association with the Travel Business Roundtable. Caroline serves on the Executive Committee of the World Travel and Tourism Council — Visit California was the first destination marketing organization invited to join the WTTC.

Caroline has received numerous awards for her creative work and leadership in the travel industry, including induction into the U.S. Travel Association's Hall of Leaders.

Caroline holds a bachelor's degree in International Relations from the University of California, Los Angeles and a master's degree in Public Administration/Intergovernmental Affairs from the University of Southern California. She also completed the Stanford Graduate School of Business Executive Marketing Management Program.



VICE PRESIDENT OF MARKETING

## Lynn Carpenter

Lynn Carpenter is vice president of Marketing for Visit California. Lynn oversees all of Visit California's marketing, including advertising, cooperative promotions, travel trade, web and interactive, and publications.

Lynn steers a marketing budget that has grown from \$6 million in 2006 to \$131 million today. Under her leadership, Visit California has marketed the state as a place of abundance and opportunity. Lynn has added international offices in China, Mexico, and South Korea - among others - to Visit California's portfolio, spreading the state's brand around the globe in an effort to grow California's share of tourism revenues.

Lynn has more than 20 years of professional marketing experience and extensive knowledge of online technology promotions and brand development. She began her career in the technology industry, serving as Vice President of Marketing at Netscape Communications and AOL Time Warner. She crossed the threshold into the travel industry as Executive Director of Marketing and Sales for Mammoth Mountain Resort.

She is a resident of Loomis, where she lives with her husband and two children. They enjoy spending their time in the outdoors.



# 2019 Sponsors





### Union Bank Invests in the Environment

Union Bank's green just got a lot greener! All of Union Bank's offices that are located within MCE's service area have enrolled in [Deep Green electricity service](#), enabling these locations to switch to 100 percent renewable energy and furthering the bank's commitment to building healthy and sustainable communities. The decision makes Union Bank the first financial institution to commit to Deep Green and allows its Marin County and Walnut Creek operations to be 100 percent carbon-free.

By enrolling in the program, the participating Union Bank offices now operate while emitting zero greenhouse gas emissions from electricity usage. The initiative was a collaboration between the bank's Corporate Real Estate team and Environmental Stewardship Department.



## Crystal Geysers Water Pleads Guilty to Dumping Arsenic into California's Ecosystem

The beverage maker agreed to pay a fine of \$5 million after pleading guilty to two felony offenses earlier this month

By **Benjamin VanHoose**

January 16, 2020 04:50 PM



**From:** [shari](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Five year plan  
**Date:** Friday, February 14, 2020 8:51:21 AM

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I want to complement the agency for all of your great work and will continue to support you in the future. Please keep our coast line healthy and accessible by everyone. Please continue to stand against private and tribal interest that want to shut off access and monetize the coast to server their own selfish interests.

I did not read every word of your 5 year plan but I did not see anything about light pollution. This may be beyond your scope but I think you consider what light does to the wildlife that live along the coast as well as light that impinges on the the beauty of our coastline at night. You may address some of these concerns when reviewing any development requests and I hope you consider adding light concerns in the future.

Thank you!

Shari

**From:** [ridgebks@aol.com](mailto:ridgebks@aol.com)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Comments on the 2020 - 2025 Strategic Plan  
**Date:** Friday, February 14, 2020 8:57:07 AM

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Dear Sir/Ms:

I would like to submit the following comments:

1. Under Objective 2.3 Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast:

Please add 2.3.4. Support designation of areas that allow for recreation with off-leash and on-leash dogs. Additionally, off-leash exercise areas allow and encourage people to exercise with their dogs, resulting in healthier humans as well. It also contributes to increased visitor/tourist use of our beautiful coastline.

2. Objective 2.4 Encourage Lower-Cost Visitor-Serving Opportunities and Facilities

Please add 2.4.3 Support designation of areas that allow people to recreate with their off-leash dogs and on-leash dogs. This would allow lower income citizens access to free coastal exercise areas.

I feel these are valid additions as dog ownership has become very popular with over 40% of all homes having a dog. Off-leash activities are often very important to these citizens and preserving a part of our coastline for their use seems reasonable.

Thank you for your consideration.

Dr. Jean Spengel  
1611 Alta La Jolla Dr  
La Jolla, CA.  
92037



Scenic Pacifica  
Incorporated Nov. 22, 1957

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## CITY OF PACIFICA

170 Santa Maria Avenue • Pacifica, California 94044-2506  
[www.cityofpacifica.org](http://www.cityofpacifica.org)

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**MAYOR**  
Deirdre Martin

**MAYOR PRO TEM**  
Sue Beckmeyer

**COUNCIL**  
Sue Vaterlaus  
Mary Bier  
Mike O'Neill

February 14, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**RE: California Coastal Commission Strategic Plan Public Review Draft 2020-2025**

The City of Pacifica (City) appreciates the opportunity to comment on the California Coastal Commission's (Commission) proposed 2020-2025 Strategic Plan, which seeks to provide a framework of goals, objectives, and actions to set the Commission's priorities for the next five years.

In January 2019, the City provided input on the Strategic Plan (attached) and wanted to thank the Commission for addressing adaptation implementation funding; outreach and communication; and sediment management in the Strategic Plan. We also support Objective 4.5.3 which is consistent with Pacifica's goals for the updated Local Coastal Land Use Plan and new Sharp Park Specific Plan. Objective 4.5.3 states:

Develop policy guidance for local governments on developing new or updating LCPs to reduce greenhouse gas emissions, including through smart growth, complete streets, public transportation, electric vehicle infrastructure, mixed use development, affordable housing, and increased housing density.

We appreciate recent discussions with Commission staff regarding policies that address the unique characteristics of Pacifica's development pattern and proximity to jobs and transit resources. We look forward to seeing the final outcome of the Strategic Plan update process and continuing to work with the Commission on the City's LCLUP update.

Sincerely,

Kevin S. Woodhouse  
City Manager

Tina Wehrmeister  
Planning Director

cc: City Council  
attachment





Scenic Pacifica  
Incorporated Nov. 22, 1957

---

## CITY OF PACIFICA

170 Santa Maria Avenue • Pacifica, California 94044-2506  
[www.cityofpacifica.org](http://www.cityofpacifica.org)

---

**MAYOR**  
Sue Vaterlaus

**MAYOR PRO TEM**  
Deirdre Martin

**COUNCIL**  
Sue Beckmeyer  
Mary Bier  
Mike O'Neill

January 31, 2019

Mr. Jack Ainsworth, Executive Director  
California Coastal Commission  
45 Fremont St., Suite 2000  
San Francisco, CA 94105-2219

***Re: Input on the Coastal Commission Strategic Plan Update***

Dear Executive Director Ainsworth:

Thank you for the opportunity to provide input on the Coastal Commission Strategic Plan Update, which will serve to inform the Commission's goals, objectives, and actions for the next five years. Coastal communities are facing difficult challenges as they plan for the potential social and economic impacts of climate change. It is therefore important that the Commission continue to engage and collaborate with coastal communities about solutions that reflect both local community interests and Coastal Act requirements. The City of Pacifica offers the following initial suggestions for inclusion in the Strategic Plan and looks forward to commenting on the public review draft in the future.

1. The Commission should consider engaging and acting as an advocate for coastal communities when certain projects inside and outside the coastal zone could exasperate the problem of a lack of sand supply for replenishment at the coast. For example, the CCC should engage on dredging, mining, and other projects that will reduce the amount and quality of sand supplies for the coast. If an area must be dredged or have sediment otherwise removed, the Commission should advocate for the material to be made available to coastal communities.
2. Identify funding sources and implement grant programs to assist agencies with *implementation* of sea level rise adaptation measures.
3. Seek to conduct more public outreach in coastal communities. In particular, there needs to be significantly more outreach about adaptation policies, particularly the Commission's preference for managed retreat strategies in coastal communities in which that strategy could pose significant legal, economic, and social ramifications. This



outreach is particularly important where established neighborhoods, cities, and towns that pre-date the Coastal Act could be impacted. The Commission should engage with these communities to more thoroughly understand the social, financial, and legal concerns managed retreat strategies would pose.

4. Continue to engage with the League of California Cities Coastal Cities Group to improve lines of communication and issues to focus on in collaborative dialogue with this group.

Thank you again for an opportunity to provide input at this initial stage.

Sincerely,

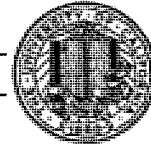


Kevin S. Woodhouse  
City Manager



Tina Wehrmeister  
Planning Director

cc: Pacifica City Council  
League of California Cities Coastal Cities Group



OFFICE OF THE VICE CHANCELLOR---  
RESOURCE MANAGEMENT AND PLANNING

9500 GILMAN DRIVE, DEPT. 0057  
LA JOLLA, CALIFORNIA 92093-0057

PHONE: (858) 534-6820  
FAX: (858) 534-9836

February 14, 2020

Jack Ainsworth, Executive Director  
California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Dear Jack:

In January 2020, UC San Diego received an invitation seeking input on the California Coastal Commission's Draft 2020-2025 Strategic Plan. We understand that the Draft Strategic Plan provides a framework of goals, objectives, and actions to set priorities and guide the agency's performance for the next five years and that a final plan is anticipated to be adopted by the Commission in April or May 2020.

As a top-tier public research university, UC San Diego shares in many of the goals set forth in the Strategic Plan and appreciates the opportunity to provide input. In particular, similar to the California Coastal Commission whose governing statute guarantees the right of coastal access for all, UC San Diego's strategic mission also aims at ensuring accessible and affordable education is available for all. Through our education and research one of our many goals, and where we see alignment with your goals, is to enhance and protect the planet, as evidenced by the recent inclusion of these goals into the academic curriculum of our most recently formed undergraduate college - Seventh College - whose theme is "A Changing Planet."

Specific to the Strategic Plan we offer the following input:

- As a partner state agency with a portion of our campus within the California Coastal Zone and with limited resources UC San Diego continuously looks to improve upon and streamline where feasible the coastal development permit (CDP) application submittal and review process, to ensure the campus can continue to meet the many needs of our growing campus.
- To enhance partnership coordination and shared resources in support of Goal 3 (Protect and Enhance Coastal Resources) the university is more than willing to collaborate and share with the Commission the in-depth knowledge and research from our scientists at UC San Diego, including researchers at our world-renowned Scripps Institution of Oceanography, whose findings can help further the Commission's understanding of climate science and coastal processes.
- Specific to Goal 8: "Continue to Develop and Maintain Partnerships and Enhance Public Presence" is another area that the university can closely partner and collaborate with the Coastal Commission, as it relates to "collaboration with academic institutions to obtain the best scientific information."

- In support of Goal 6 and specific to Objective 6.1 (Continue to Improve Communication and Planning with Local Governments) we propose and look forward to scheduling regular meetings with local staff that will help:
  - establish mutual expectations;
  - explain the project review process;
  - provide an early opportunity for project experts to meet/discuss findings and solutions;
  - develop a proactive approach that will allow for expeditious review and analysis of CDP applications which result in minimizing the waste of resources (time and cost savings);
  - allow Commission Staff to outline and provide early guidance; and
  - support the Commission's Core Value for Implementation as stated in the Draft Strategic Plan, "we avoid rigid bureaucratic response and embrace the role that learning, discovery and creativity play in the Commission's daily work."

We believe close coordination and engagement with Commission staff as outlined will serve as a platform for productive discussion, and allow a mutual understanding of agency directives, goals, objectives and actions.

The University greatly appreciates the opportunity to review and provide comments on the 2020-2025 California Coastal Commission Strategic Plan and look forward to our continued collaboration in support of the Coastal Act.

Sincerely,



Gary C. Matthews  
Vice Chancellor  
Resource Management and Planning  
University of California San Diego

CC: Robert Clossin, Director Campus Planning  
Anu Delouri, Assistant Director

**From:** [Matt Fuller](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Comments on the 2020-2025 Strategic Plan  
**Date:** Friday, February 14, 2020 9:36:17 AM

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Dear Coastal Commission:

I am submitting two comments for your consideration.

Please include these changes to increase access to the coast for the millions of Californians and visitors with dogs:

1. Under **Objective 2.3 Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast**

Please add 2.3.4 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

2. **Objective 2.4 Encourage Lower-Cost Visitor-Serving Opportunities and Facilities.**

Please add 2.4.3 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

--

Matt Fuller  
522 Wykes Street  
Chula Vista, CA 91911

**From:** [Tyler Foltz](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Cc:** [Hall, Andy@City of Imperial Beach](#); [Chris Helmer](#); [Erika Cortez](#)  
**Subject:** Comments RE: 2020-2025 CCC Strategic Plan  
**Date:** Friday, February 14, 2020 11:03:05 AM

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Below are comments for the Draft California Coastal Commission Strategic Plan for 2020-2025. Thank you.

-The plan should incorporate an objective to resolve the pollution in the Tijuana River Valley and associated Pacific coastline. Transborder pollution from the Tijuana River has contaminated U.S. waters and the California coastline for decades, forcing regular beach closures that severely impact coastal access. Addressing this matter should be a focal point for the state.

-The plan should provide a more detailed discussion about facilitation of LCPs. The draft plan states the following: "The Commission uses common sense and seeks practical solutions to the planning and regulatory challenges we face and listens carefully to find positive alternatives. We avoid rigid bureaucratic response and embrace the role that learning, discovery, and creativity play in the Commission's daily work." This should be emphasized at a local level, as many communities are hesitant to update all or portions of an LCP because the goals set are not always feasible and/or obtainable.

-The Coastal Commission should support local solutions provided they are consistent with the Coastal Act rather than employee "one size fits all" solutions, guidelines and regulations that require all communities to implement strategies that may not be effective for specific geography.

Tyler Foltz, AICP  
Acting Director  
Community Development Department  
City of Imperial Beach  
825 Imperial Beach Blvd.  
Imperial Beach, CA 91932  
Phone: (619) 628-2381 | Fax: (619) 424-4093  
tfoltz@imperialbeachca.gov | [www.ImperialBeachCA.gov](http://www.ImperialBeachCA.gov)



**From:** [Kathy Parrish](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Comments on the 2020-2025 Strategic Plan  
**Date:** Friday, February 14, 2020 10:01:40 AM

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Dear Commissioners,

The California coast is one reason so many people love to live in and visit our state. And as a lifelong San Diegan, I can affirm that more and more people own dogs and more and more restaurants, breweries, hotels, etc. are dog friendly. With that in mind, here are a couple of comments about the plan.

Please include these changes to increase access to the coast for the millions of Californians and visitors with dogs:

1. Under **Objective 2.3 Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast**

Please add 2.3.4 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

2. **Objective 2.4 Encourage Lower-Cost Visitor-Serving Opportunities and Facilities.**

Please add 2.4.3 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

Thank you for your time and all your work to protect our coast and protect the rights of everyone to use it!

Kathy Parrish

**From:** [Peggy Ray](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Changes To Be Added to Strategic Plan  
**Date:** Friday, February 14, 2020 11:48:47 AM

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Please include these changes to increase access to the coast for the millions of Californians and visitors with dogs:

1. Under **Objective 2.3 Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast**

Please add 2.3.4 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

2. **Objective 2.4 Encourage Lower-Cost Visitor-Serving Opportunities and Facilities.**

Please add 2.4.3 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

In San Diego, we have a wonderful open space on Fiesta Island that is leash free. It is used by hundreds of people of all ages and background, and their pups. As the area becomes more congested and expensive, it is imperative that we keep areas open and free to our citizens and their pets.

Thank you.

Peggy Ray  
San Diego, California

Sent from my iPhone



February 14, 2020  
California Coastal Commission  
ATTN Chair Steve Padilla  
45 Fremont Street  
#2000 San Francisco, CA  
94105

CC: Executive Director Jack Ainsworth

**RE: Recommended Changes to the Draft 2020-2025 Strategic Plan**

Dear Chair Padilla and Commissioners,

Surfrider and the California Coastal Protection Network (CCPN) have actively engaged in Commission proceedings on behalf of our membership and the public over a period of many years and are well versed in Commission procedures and how those procedures impact public participation and Commission workload. We believe our experiences can help inform improvements to current procedures and that the changes suggested below, while requiring modest staff attention up front, will result in substantial reduction of the onerous burden that some current practices place on Commission staff, Commissioners and all stakeholders including applicants and the general public.

In September of 2019, we submitted a letter to the Commission in support of the recommendations contained in the UCLA Emmett Institute's law and policy brief titled "[The California Coastal Commission: Increasing Transparency, Accountability, and Opportunities for Effective Public Participation](#)" authored by Ralph Faust, who served as the Coastal Commission's Chief Counsel for 20 years.

On Feb. 13, 2020, Surfrider and CCPN submitted testimony on the Commission's 2020-2025 Draft Strategic Plan and noted that, for the most part, the recommendations contained in the UCLA Faust Brief were largely absent from the Draft Plan and certainly were not prioritized as we had hoped. (For example, Objective 5.2.5 in the Environmental Justice Section references the phasing of hearings, which *is* important for Environmental Justice, but also affects a far broader range of Commission issues and decisions.)

We understand that the Commission is underfunded and that staff is doing its best to produce a high-quality work product under difficult conditions. We also firmly believe that implementing the recommended changes outlined below will result in a significant reduction in the workload for both staff and Commissioners, with equivalent benefits accrued to all stakeholders.

With this in mind, we recommend that the Commission direct staff to prioritize in the 2020-2025 Strategic Plan two important changes to the Commission's procedures and practices. The first may

require a change to the current regulations; based on testimony at the Feb. 13 hearing on the Draft Strategic Plan, the second one could likely be handled internally without a change to the regulations:

**1. Establish a firm time frame and deadline for when the Commission accepts new information into the public record prior to the hearing.** Our recommendation is that Commissioners and the public have at least one full week to consider the final staff report accompanied by all of the key written comments and other materials submitted by applicants and other stakeholders. After publication of the final staff report, we recommend the commission accept only oral comments at the hearing. While a firm time frame would be a shift from current practice, it would eliminate the late submission of materials and proposed new permit conditions – often voluminous and nearly impossible to adequately consider – that impose a substantial burden on Commissioners, staff and stakeholders, and that can impair the perceived fairness and transparency of Commission hearings. We anticipate the best specific timeline can be determined by the Commission after discussions with staff and stakeholders. As we understand it, establishing reasonable limits on submissions of information may require a change to the Commission’s regulations, but is perhaps the most critical change needed.

**2. Phase hearings for complex and controversial projects.** Faust’s recommendation that use of both fact-finding and decision-making hearings will enable staff to:

- prepare an adequate record;
- ensure that Commissioners are able to carefully scrutinize and review the documentation in the record and make any additional information requests before they are under pressure to make a decision;
- are subsequently prepared to ask relevant questions and focus on key substantive issues during the final decision hearing.

Based on discussion at the Feb. 13 hearing on the Strategic Plan, we believe this could be instituted internally without initiating a change to the regulations.

Surfrider and CCPN urge the Commission to include and prioritize these recommendations in the 2020-2025 Strategic Plan.

Sincerely,



Jennifer Savage  
Surfrider Foundation



Susan Jordan  
California Coastal Protection Network

February 14, 2020

California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105,

Cc: Jack Ainsworth and Madeline Cavelleri

Re: Comments on Draft Strategic Plan

Dear Executive Director Ainsworth and Honorable Commissioners,

On behalf of The Nature Conservancy, we respectfully submit the following comments to help inform the California Coastal Commission's 2020-2025 Strategic Plan. The mission of the Nature Conservancy (TNC) is to conserve the lands and waters on which all life depends, which includes supporting thriving coastal ecosystems and communities.

The California Coastal Commission (CCC) plays an integral role in protecting and enhancing California's coastal resources, and TNC and the CCC share a commitment to safeguard valuable coastal habitat and public access in the face of a changing climate. In 2018, we embraced a bold and unified vision to protect and increase the natural landscape along the coast to meet the threats presented by sea level rise. Through this initiative, known as *Hope for the Coast*, we are working toward collective implementation of well-defined strategies that conserve California's vulnerable coastal habitats in the face of sea level rise. On August 9, 2018, CCC adopted the Hope for the Coast vision and made actionable commitments to its implementation. We applaud these bold commitments.

This Strategic Plan is the first step toward implementation of these commitments, and will guide the agency's work on coastal conservation and sea level rise adaptation through 2025. To this end, the Strategic Plan creates a blueprint for achieving its Hope for the Coast goals. It is with this in mind that we offer the following specific recommendations for content that will support our shared vision for the future of California's coast.

### Recommendations for Strategic Plan:

1. **Clearly articulate the scale and urgency of the challenge that sea level rise poses to California's coastal resources and public access.** A majority of California's coastline exists as natural habitat, over one-third of which has been preserved thanks – in part – to the diligence of the CCC in administering the Coastal Act. Yet, this coastline is at risk: sea level rise, along with other climate change impacts, will have profound effects on our coastline and its natural resources. The vulnerability assessment *Conserving California's Coastal Habitats: a Legacy and Future with Sea Level Rise*, produced by TNC and the State Coastal Conservancy, showed that 5 feet of sea level rise imperils 59% of coastal habitats while drowning 41,000 acres of coastal conservation lands. This study demonstrated that there *is* a path to conserving California's coastal habitats in the face of sea level rise, but achieving this outcome will require concerted, sustained effort across multiple agencies. The CCC should embrace its role as a leader among the suite of state agencies addressing this problem. CCC's Strategic Plan is one of the foundations of this leadership and will shape the next critical years of action.
2. **Articulate that shoreline armoring is only permitted if necessary and if no less environmentally damaging feasible alternative is available.** We commend the CCC for its leadership in proposing to develop a publicly-accessible coastal armoring database. There is a great deal of evidence showing that seawalls and other shoreline armoring structures cause serious adverse impacts to coastal habitat and access; these structures interfere with natural bluff



erosion and shoreline migration, resulting in beach loss and ultimately, loss of beach access to the public. A variety of nature-based alternatives to armoring exist, which use natural features and processes to protect property at a lower relative cost than armoring. These natural alternatives have additional benefits of maintaining public access and restoring and enhancing the natural character of the coast. The CCC plays a leading role in supporting the implementation of a suite of adaptation strategies, including nature-based solutions, and should ensure that armoring is always a last resort.

3. **Drive the implementation of climate change adaptation strategies that provide or maintain open space area to protect and provide migration opportunities for ESHA, wetlands, and other coastal habitats.** We are very pleased to see the CCC prioritize the use of the best available science in the development of guidelines for adaptation strategies. As a whole, California has made substantial progress in promoting sea level rise science and related adaptation measures. The result is a growing number of coastal communities with access to accurate and in-depth vulnerability information that provides a strong foundation for adaptation planning. This information tells us, among other things, that vulnerable habitats benefit from strategies that promote the ability of natural systems to migrate landward. The Strategic Plan enables policy guidance that moves development out of vulnerable areas, and we applaud the CCC for its explicit consideration of this issue. We suggest strengthening the Strategic Plan by directly supporting the implementation of adaptation strategies that provide or maintain open space areas where ESHA, wetlands, and other critical coastal habitats can migrate.
4. **Articulate a commitment to enhance partnerships with state agencies that manage public coastal assets.** CCC has, over the years, worked closely with its sister agencies to develop policy governing the management of publicly-owned assets. For example, CCC has worked closely with Caltrans and the State Lands Commission on strategies for managing infrastructure in the coastal zone. We applaud this close coordination, and call on CCC to build from it. The Strategic Plan should commit to the development of cooperative agreements with these agencies and others like State Parks, whose management of public assets in the coastal zone have significant impact on coastal natural resources. Such partnerships can ensure that decision-making impacting coastal natural resources – whether made by local or state actors – is coordinated and designed to achieve conservation.

The Nature Conservancy is looking forward to working with the CCC to achieve the objectives set out in the Strategic Plan. We will continue to produce science-based solutions and seek out innovative approaches to conservation that can help drive the protection and public-access outcomes that California seeks to achieve for its coasts. We hope the CCC will stay in close coordination with TNC and other important stakeholders in this space as the agency moves towards implementation.

Thank you for the opportunity to provide recommendations.

Sincerely,



Alyssa Mann  
Project Director for Disaster Resilience



Sydney Chamberlin  
Climate Policy Associate

**Jeffrey Lambert**  
**Community Development Director**  
Community Development Department  
214 South C Street  
Oxnard, CA 93030  
(805) 385-7882  
jeffrey.lambert@oxnard.org



February 14, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 200  
San Francisco, CA 94105

**Subject: Comments on the 2020-2025 California Coastal Commission Strategic Plan**

Dear Mr. Ainsworth:

The City of Oxnard (City) appreciates the opportunity to provide comments on the preparation of the 2020-2025 California Coastal Commission's (Coastal Commission) Strategic Plan (Strategic Plan). The City is currently undertaking an effort to update the City's Local Coastal Plan (LCP) and appreciates all of the guidance and assistance extended by the Coastal Commission staff. The City has enjoyed a positive and professional relationship with the Ventura Regional office. The Ventura Regional office staff has been diligent in their response time and guidance to the City when queried, which has assisted the City in making critical decisions on how to proceed with projects or critical elements of projects. Please accept the following comments which are based on the City's ongoing project case load, LCP update, and general interaction with Coastal Commission.

**Goal 1: Enhance Agency Capacity and Maintain Effective and Diverse Workforce**

The City recommends the inclusion of policies into the Strategic Plan that will require funding for additional Coastal Commission staff and modernize the Coastal Commission's website and information (digitized documentation and maps). The City understands that the Coastal Commission is constrained by limited resources similar to that of local jurisdictions like the City of Oxnard. However, the Coastal Commission policies and requirements do not take into account the financial constraints to local jurisdictions. The Strategic Plan should emphasize the need for

additional resources to enhance and encourage additional cooperation between the Coastal Commission staff and local governments.

### **Goal 2: Maximize Public Access and Recreation for All**

The City's shoreline is a regional attraction that is known for being relatively accessible. One of the principal cores of the Strategic Plan and the City is to make the City's shoreline accessible to all sectors of the population. Furthermore, the City believes that making the City's beaches/waterfronts and Channel Island Harbor (Harbor) accessible to all sectors of the population is a vital component to addressing social justice for low income residents seeking recreational opportunities. It is the City's recommendation that the Strategic Plan address coordination with local governments to develop guidelines to address local beach/waterway/Harbor access and management issues. Guidelines should be developed to address the unique circumstances reflected in each community. Jurisdictions should have the ability to select from a series of options which reflect the local jurisdiction's key policy goals, vision, and Council directives.

One of the major impediments for local jurisdictions to provide ongoing maintenance of public access ways are the permit and/or management plan requirements. Local governments are typically required to receive approval of a Coastal Development Permit and/or adoption of a sand management plan to maintain public access ways. The City believes that maintenance of public access ways to facilitate unobstructed public access to the City's beaches is critically important as a way to remove an impediment to visitors frequenting the City's beaches. The development of access and maintenance policies that do not require a Coastal Development Permit and/or adoption of a Sand Management Plan which comply with Coastal Commission established performance measures would facilitate time efficient methods for maintaining public access ways without compromising the ecological integrity of the local beaches.

Another major impediment for maximizing public access and recreational opportunities is the existing environmental injustice placed upon communities like Oxnard which has been burdened with decades of pollution by the industrialization of the City's coastline. The City's coastline is home to two power plants and an EPA Superfund toxic waste site. Residents and visitors alike are discouraged to visit the City's shorelines which are surrounded by these uses. Additionally, the isolation caused by these uses creates a space for the displaced and homeless population to establish illegal encampments that threaten the surrounding ecological system and further discourage beach goers from visiting the City's beaches. The City recommends that the Strategic Plan include policies that facilitate removal of existing power plants and other similar infrastructure. Additional policies should encourage cooperation between Federal, State, local and regulatory agencies to fund and facilitate removal and environmental remediation of existing

power plants and other similar infrastructure to maximize public access and recreational opportunities.

### **Goal 3: Protect and Enhance Coastal Resources**

The City is currently working with the State Coastal Conservancy and The Nature Conservancy on the Ormond Beach Restoration and Access Plan which would restore wetlands, and improve and provide public access within the Ormond Beach area. The City recommends that the Coastal Commission include a policy that would facilitate Coastal Commission staff coordinating with local agencies and partners to identify permit coordination and restoration implementation. The City understands that the Ventura Regional office appears to have limited resources and additional tasks might place additional burdens on Coastal Commission staff; however, interagency coordination could provide opportunities to complete restoration projects sooner than anticipated, which could facilitate beach access to the general public in a time efficient manner.

The policies identified under Goal 3 discuss “coordination” and “guidance” for a number of actions, but it is unclear what these terms mean and how they would apply to projects or plans. The City’s concern is that these terms could lead to duplicative requirements or reviews. The City recommends clarifying language to avoid duplicate reviews and requirements that would otherwise constrain projects and plans moving forward efficiently.

### **Goal 4: Support Resilient Coastal Communities in the Face of Climate Change and Sea Level Rise**

The City recognizes the importance of addressing climate change. In October of 2011, the City adopted the 2030 General Plan which included a policy that the best-available information regarding sea level rise be included in the City’s LCP update. Based on the City’s LCP update efforts, the City recommends that the Strategic Plan update include a policy that would strongly encourage Coastal Commission staff to hold public outreach meetings to solicit input from the general public on the State’s Sea Level Rise (SLR) policy guidance. The City believes it is beneficial for the Coastal Commission to execute a collaborative process to evaluate options to address this complex and controversial topic. The City does not believe a one size fits all approach is appropriate, and believes a menu of options should be proposed by the Coastal Commission to address the SLR issue. While we understand that the Coastal Commission is directing that the issue of SLR be addressed when making amendments to a local LCP, choice reflecting local vision while still protecting resources should be the driving approach.

The City is currently undertaking an effort to update the City’s LCP. The City is appreciative of all the guidance and assistance that Coastal Commission staff has extended to the City during the

process. One of the difficult tasks that the City has faced in the LCP update is trying to develop policies addressing SLR that are acceptable to the Coastal Commission, and are also acceptable to both the City residents and local decision makers. The City recommends that the Coastal Commission include policies in the Strategic Plan that allow for flexibility when addressing SLR in LCP amendments based on the local jurisdiction's unique circumstances which might include but are not limited to budgetary constraints, community character, and existing conditions.

The City is also concerned with the financial burden that the SLR policy guidance places on local governments when addressing SLR in LCP amendments. Through the LCP update process, the City has received comments that certain studies and maps are required to be completed and updated during a certain time frame after the LCP is certified. The City recommends the Strategic Plan include policies that address funding shortfalls for local governments that do not have funding available to comply with SLR policy compliance. Additionally, the Strategic Plan should also include a policy that encourages State and Federal agencies to utilize economies of scale and provide such studies and maps for the whole of the coast in order to view SLR in a holistic manner and to ease the financial burden to local jurisdictions.

#### **Goal 5: Advance Diversity, Equity, Environmental Justice, and Tribal Relations**

The City of Oxnard is supportive of all efforts to advance diversity, equity, environmental justice, and tribal relations. The City recommends that the Strategic Plan include objectives that encourage Coastal Commission staff to coordinate with local organizations and partners that work with underserved populations to learn about the barriers that prevent underserved populations from participating in the decision making process, visit local beaches, and access key documents. The City also recommends the inclusion of objectives that fund educational trips for underserved students to expose them to local beaches to learn about their ecosystems and ecological importance to the surrounding areas.

As previously mentioned under Goal 2, the City recommends that the Strategic Plan include objectives that will facilitate the removal of existing power plants and other similar infrastructure. Additional policies should encourage cooperation between Federal, State, local and regulatory agencies to fund and facilitate removal and environmental remediation of existing power plants and other similar infrastructure to maximize public access and recreational opportunities.

#### **Goal 6: Continue to enhance the LCP Planning Program and Refine Implementation of the Regulatory Program**

The City has developed a cordial and professional relationship with the Ventura Regional office staff. The City is appreciative of the guidance and assistance the Ventura Regional office has



extended to the City. The City supports policies that continue to foster cooperation between the City and Coastal Commission staff. Understanding that the Ventura Regional office encounters resource limitations like many local jurisdictions, the City would recommend policies that would provide funding for additional Coastal Commission staff in regional offices, including the Ventura Regional office, to help expedite review of Coastal Commission review of LCP submittals.

**Goal 7: Expand and Enhance the Enforcement Program**

The City often fields inquiries from residents on how to successfully contact Coastal Commission staff without having to visit the Ventura Regional office. Based on statements from applicants, it appears that applicants have a difficult time reaching a staff member via phone or email. Additionally, applicants and residents raise concerns about the Coastal Commission's website. The City recommends that the Strategic Plan include policies that include an update to the Coastal Commission's website. The City also recommends that the Strategic Plan include policies that will address staff shortages and the need to fund additional staff members in regional offices to interface with the general public.

**Goal 8: Continue to Develop and Maintain Partnerships and Enhance Public Presence**

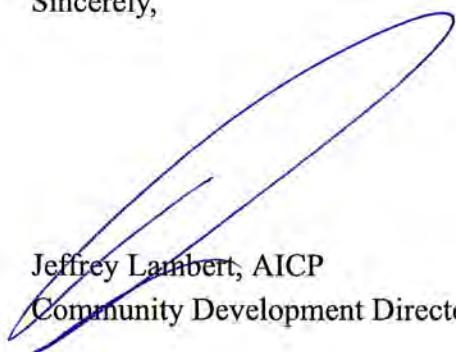
The City is supportive of all efforts made by the Coastal Commission to continue to improve communications, collaboration, and coordination with outside agencies. The City recommends that the Strategic Plan identify and work with key non-governmental groups that assist underserved communities in order to increase participation and knowledge of key coastal issues. Additionally, the City recommends that the Strategic Plan should include objectives that foster working relationships with non-governmental groups that assist underserved communities in order to facilitate educational trips to the coast for students. The City also recommends that the Strategic Plan include objectives that encourage the participation of Federal, State, regulatory, local and non-governmental agencies to work together to facilitate the removal and environmental remediation of existing power plants and other similar infrastructure to maximize public access and recreational opportunities to address ongoing environmental injustice that plagues communities like the City of Oxnard.

**Goal 9: Enhance Information Management and E-Government**

As previously mentioned in the City's comment to Goal 7, the City is supportive of any efforts to update the Coastal Commission website. The Strategic Plan should include policies that encourage updating forms, maps, plans and all other information that would assist residents and local jurisdictions and would also facilitate the dissemination of information. While recognizing funding limitations, the City has repeatedly recommended that the Strategic Plan update include policies that will require funding for additional Coastal Commission staff and modernization to

the Coastal Commission's website and information (digitized documentation and maps). The City encourages the Coastal Commission to include policies that encourage sharing of Geographic Information System (GIS) data with local governments. Coastal Commission staff might see some relief in interfacing with the general public and local jurisdictions by updating the Coastal Commission website. The City believes that modernizing the Coastal Commission website will facilitate information sharing and provide for an increase in awareness of the Coastal Commission's mission and responsibilities.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey Lambert", is written over the typed name and title.

Jeffrey Lambert, AICP  
Community Development Director

**From:** [Debra Madden](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** CCC 2020-2025 Strategic Plan Comments  
**Date:** Friday, February 14, 2020 1:54:53 PM

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Please specifically identify coastal access for local residents and visitors alike who choose to recreate with family members that include their dogs. **Goal 2** is to maximize public access and recreation for all. Many families, mine included, regularly exercise with their dogs. Access to beaches for these families should be included.

Likewise, **Goal 5** is to advance diversity and equity. Not everyone can afford to recreate at coastal areas that feature expensive restaurants, hotels and equipment rentals. Opportunities for all families to access coastline, including those families with dogs, at no cost should be preserved.

Sincerely,

Debra Madden  
1611 Alta La Jolla Dr  
La Jolla, CA. 92037  
[mrsломadden@aol.com](mailto:mrsломadden@aol.com)

**From:** [Sandra Nobile](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Comments on the 2020-2025 Strategic Plan  
**Date:** Friday, February 14, 2020 2:30:33 PM

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Please include these changes to increase access to the coast for the millions of Californians and visitors with dogs:

1. Under **Objective 2.3 Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast**

Please add 2.3.4 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

2. **Objective 2.4 Encourage Lower-Cost Visitor-Serving Opportunities and Facilities.**

Please add 2.4.3 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

Thank you for your consideration.

Respectfully,

Sandra Nobile  
7720 Roseland Drive  
La Jolla, CA 92037



401 B Street, Suite 800  
 San Diego, CA 92101-4231  
 (619) 699-1900  
 Fax (619) 699-1905  
 www.sandag.org

February 14, 2020

File Number 7300400

Mr. Jack Ainsworth  
 Executive Director  
 California Coastal Commission  
 45 Fremont Street, Suite 2000  
 San Francisco, CA 94105  
 strategicplancomments@coastal.ca.gov

MEMBER AGENCIES

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 Tribal Chairmen's Association  
 Mexico

Dear Mr. Ainsworth:

Subject: 2020 - 2025 California Coastal Commission Strategic Plan

The San Diego Association of Governments (SANDAG) has a strong history of working closely with local Commission staff that has helped propel a number of projects forward in the San Diego region, including the North Coast Corridor Program, double tracking of the Los Angeles – San Diego – San Luis Obispo Rail Corridor, and sand nourishment on local beaches. As is evident with the Del Mar Bluffs and the recent 2019 washouts, the need for resilient and adaptive infrastructure planning is ever present. A coordinated approach between agencies is needed to address climate change impacts as we seek out creative solutions to enhance resilience in the region and throughout the state.

To that end, SANDAG appreciates the opportunity to provide comments on the Public Review Draft of the 2020-2025 California Coastal Commission Strategic Plan and offers the following comments.

**Border Relations, Social Equity, and Tribal Governments**

The state of California is unique for a variety of reasons, one of which being that it shares an international border with Mexico and jurisdictional borders with tribal lands. There are 17 federally-recognized tribal nations with jurisdiction over 18 reservations within San Diego County – the most in any county in the United States. To this point, SANDAG encourages the Commission to directly address and acknowledge the State's international and intergovernmental setting as it relates to the nine priority goals to ultimately "protect the coast for present and future generations (page 4)" and include consideration of the border and tribal nations throughout the Strategic Plan.



For example, Goal 1 could acknowledge the need to have trained and prepared personnel to understand the diversity of the entire state, including the border and tribal governments. Goals 2, 3, and 4 should acknowledge coordination with U.S. federal agencies, border stakeholders, tribes, and representatives from Mexico when discussing access to beaches, protection of coastal areas, and ongoing collaboration to address climate change impacts. Furthermore, Goal 5, titled “Advance Diversity, Social Equity, Environmental Justice, and Tribal Relations,” appears to pair tribes with disadvantaged communities. SANDAG encourages the Commission to consider opportunities throughout the Strategic Plan to instead associate borders and tribes with “vibrant communities, creativity, competitive advantages, opportunities, culture, etc.”

## **Climate Resilience**

### *Objective 1.3.3*

This objective highlights the importance of providing briefings and trainings for Commissioners on complex items and emerging issues. This type of training will be integral to advance climate planning efforts in the coastal zone. Implementing projects that are resilient to the impacts of climate change will require creative planning, design, and engineering. As such, information about best practices from across the country should be shared with Commissioners to enhance knowledge of climate adaptation planning.

### *Objective 3.6*

Objective 3.6 notes the importance of sediment management in the State. SANDAG has been working with local coastal jurisdictions since the early 1990’s to address erosion concerns in the San Diego region. Recently, these work efforts have expanded as our knowledge of sea level rise and the implications for coastal jurisdictions have been analyzed in the San Diego area. SANDAG has worked with local coastal jurisdictions on two beach sand nourishment projects that were completed in 2001 and 2012, adding a total of approximately 3.5 million cubic yards of beach quality sand to the region’s beaches. In addition, SANDAG worked with local jurisdictions to prepare Sand Compatibility and Opportunistic Use Programs (SCOUPs) that facilitate the placement of small quantities of locally available beach quality sand on permitted beaches. SANDAG policy documents and CEQA documentation that have helped guide and facilitate work in this space may be of reference to Commission staff as work is undertaken to advance this objective. Those documents are readily available for review at [sandag.org/shoreline](http://sandag.org/shoreline).

### *Objective 4.1.5*

Objective 4.1.5 highlights the importance of working with Caltrans to ensure that coastal districts’ adaptation and corridor plans reflect the best available science with regard to climate change impacts. These planning efforts may involve coordination with regional planning agencies such as SANDAG. Therefore, it is advised to involve metropolitan planning organizations and regional transportation planning agencies in these discussions for planning consistency between agencies.

#### *Objective 4.3.1*

Guidance to advance sea level rise adaptation policy development for residential development and infrastructure is critically important to the San Diego region. As the regional planning agency, SANDAG has the responsibility to plan the future transportation network for the region. As part of San Diego Forward: The 2021 Regional Plan, SANDAG is establishing a long-term vision for how people will live and work in the region. A key component of this vision is an efficient, transportation network that is resilient to the impacts of climate change. In establishing such guidance, Commission staff should consider reaching out to local jurisdictions, regional planning agencies, and transit operators to discuss the needs related to planning for residential development and infrastructure so the policy guidance can be tailored to address current issues.

#### *Objective 4.4.4*

Partnership and continued coordination with California State Parks, the State Coastal Conservancy, and other entities to maintain beaches and coastal facilities in light of sea level rise is incredibly important. These facilities are important from a State recreation perspective and also because these facilities can serve as “cool zones” during extreme heat events which may exacerbated under future climate scenarios. Given that California State Parks manages many of the beaches in the State, this department should be involved with any conversations related to the implementation of Objective 3.6, as sediment management may be key to maintaining these beaches in the future.

#### *Objectives 4.5.2 and 4.5.3*

These objectives speak to the importance of facilitating greenhouse gas emission reductions through smart growth, complete streets, public transportation, electric vehicle infrastructure, mixed use development, affordable housing, and increased housing density. These concepts are addressed and incorporated into San Diego Forward: The 2015 Regional Plan, which provides a blueprint for a sustainable future for the San Diego region. Prior to developing guidance for local jurisdictions, SANDAG encourages the Commission to reference a region’s Sustainable Communities Strategy (SCS) as part of the long-range planning process, as the SCS contains strategies that address this overall objective. Furthermore, SANDAG provides incentives and assistance to local member agencies to encourage smart growth development. The SANDAG Smart Growth Tool Box includes Smart Growth Design Guidelines, a Complete Streets Policy, and other resources and grant program information to assist local jurisdictions in the San Diego region. These resources are readily available for review at [sandag.org/landuse](http://sandag.org/landuse).

*Objective 8.1.1*

SANDAG agrees with this objective and will continue to collaborate and coordinate with the Coastal Commission staff. To that end, SANDAG has worked closely with Commission staff to advance projects in the San Diego region. Most recently, this coordination is exemplified by the work completed on the I-5 North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program (NCC PWP/TREP) which guides a number of highway, rail, bikeway, pedestrian, and environmental improvements including the restoration of the San Elijo Lagoon. Likewise, SANDAG maintains a strong working relationship with Coastal Commission staff through other forums such as the SANDAG Shoreline Preservation Working Group and the San Diego Regional Climate Collaborative. SANDAG values the relationships and coordination with local Coastal Commission staff.

Thank you for the opportunity to provide comments on the Strategic Plan. SANDAG looks forward to continuing to work with the Commission to advance projects within the San Diego region. If you have any questions, please feel free to contact Associate Regional Planner Sarah Pierce at (619) 699-7312, or [sarah.pierce@sandag.org](mailto:sarah.pierce@sandag.org).

Sincerely,



ANNA LOWE  
Senior Regional Planner

ALO/SPI/LGA/nye

TO: California Coastal Commission

FROM: Sunroad Enterprises

DATE: February 14, 2020

SUBJECT: Comments on Draft 2020-2025 Strategic Plan

Thank you for the opportunity to review the Draft 2020-2025 Strategic Plan. Sunroad Enterprises offers for your consideration the following comments.

**Goal 2- Reduce barriers to access; support youth and other public access programs; encouraging lower-cost visitor serving opportunities and facilities, and or enhancement of existing facilities** has objectives that are impactful to the community, including the business community, as it relates to our built environment and the ability to meet those goals through objectives.

- Objective 2.4 Encourage Lower-Cost Visitor Serving Opportunities and Facilities
- Objective 2.4.1 Work with State Coastal Conservancy and California Department of Parks and Recreation (State Parks) to Identify, plan for and provide new public access and lower-cost visitor serving accommodations including through effective allocation of existing and potential future in-lieu fees

We agree that Objective 2.4.1 is the path to achieve new public access and lower-cost visitor serving accommodations. The mitigation strategy should rely on the establishment of in-lieu fees (as opposed to inclusion of one-off facilities) and should be carefully developed with the business community and those seeking a CDP or other approvals. Reliance upon impact fees, such as an in-lieu fee, should be founded upon the establishment of a nexus between the need and the mitigation. A mitigation strategy founded upon nexus studies that quantify existing facilities, quantify need and calculate resulting mitigation is necessary. In this manner, In-lieu fee guidelines should be published much like any agency fee which is charged to the public. Those future in-lieu fees, paid to the appropriate agency, may be allocated and directed to programs and/or facilities as determined by the California Coastal Commission in a systematic and well-planned manner. The result is likely to be a synergistic and controlled successful program, thus meeting the stated goal.

In the establishment of nexus, the mitigation strategy should be based on a regional analysis. Inventory of facilities, the rates and the costs vary between regions. As lodging is categorized by average daily rate (ADR), rates are not tied to a constant room rate across regions. Economy lodging in the central coast would not have the same ADR as those in the state's southern beaches. Likewise, the cost of land would vary greatly between these regions. Consequently, the in-lieu fees should reflect these differences. If a regional approach is not taken, the strategy must account for the cost of lodging across the state.

Establishment of an in-lieu fee is necessary to create new, well-planned, lower-cost visitor serving accommodations. Understanding that the timeframe for completion of the required analysis and the implementation may be lengthy, an interim solution should be considered as a temporary mitigation measure. This will allow the collection of fees during the development of the ultimate solution, which could then be reconciled at some point after final implementation.

**Goal 3- Strengthen Implementation of ESHA and Wetland Policies and Advance Habitat Restoration** should take into consideration similar and/or related regulations of other regulatory agencies (federal, state and local) in order to avoid overlap. As with overlap, the risk of regulatory conflict must be eliminated in order to avoid uncertainty and mitigation implementation failure at one or more levels. The key components of the following objectives are addressed via the regulatory entitlement process regardless of the CDP or LCP.

- Objective 3.2 Advance mitigation strategies to meet coastal protection goals including develop mitigation principles and best practices for ESHA, wetland, mitigation banks and in-lieu fee programs
- Objective 3.8 Avoid and mitigate adverse impacts of development on water quality
- Objective 3.8.1 Ensure water quality protection policies and practices are included in LCP and CDPs including policies on LID, hydro mod, watershed stormwater planning, sea level rise planning

In summary, California is rich with policy and regulatory law that cover the above objectives. Suggest working closely with other regulatory agencies to avoid overlap and conflict with existing federal, state and local regulations.





**UCI** University of  
California, Irvine

Environmental Law Clinic  
School of Law  
PO Box 5479  
Irvine, CA 92616  
Phone (949) 824-9660

February 14, 2020

***Sent via Electronic Mail:*** StrategicPlanComments@coastal.ca.gov

Jack Ainsworth, Executive Director  
California Coastal Commission  
45 Fremont St., Suite 2000,  
San Francisco, CA 94105-2219

**RE: COMMENTS ON THE CALIFORNIA COASTAL COMMISSION'S DRAFT  
STRATEGIC PLAN FOR 2020–2025**

Dear Executive Director Ainsworth:

The University of California, Irvine Environmental Law Clinic submits this letter on behalf of Azul to provide comments and recommendations on the California Coastal Commission's Draft Strategic Plan for 2020–2025 ("Draft Strategic Plan"). Founded in 2011, Azul is a grassroots nonprofit organization that elevates Latinx perspectives related to ocean conservation and access to promote equitable coastal policymaking for all Californians. Azul commends the Commission's efforts to incorporate its Environmental Justice Policy ("EJ Policy")<sup>1</sup> and promote environmental justice ("EJ") in the Draft Strategic Plan.<sup>2</sup>

Adopting a new Strategic Plan gives the Commission the opportunity to identify concrete goals that will help the Commission better protect the coast for all Californians, including EJ communities.<sup>3</sup> Given that the new Strategic Plan will be the Commission's first since adopting the EJ Policy, the Strategic Plan should better reflect the Commission's stated commitment to promote environmental justice. In this letter, Azul supports objectives within the Draft Strategic

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<sup>1</sup> Azul submitted two comment letters to the Commission regarding the EJ Policy. Letter from Marce Gutiérrez-Graudiņš, Founder & Dir., Azul to Jack Ainsworth, Exec. Dir., Cal. Coastal Comm'n (Feb. 17, 2019); Letter from Marce Gutiérrez-Graudiņš, Founder & Dir., Azul to Jack Ainsworth, Exec. Dir., Cal. Coastal Comm'n (Nov. 7, 2018).

<sup>2</sup> The term "environmental justice" is defined as "the fair treatment and meaningful involvement of people of all races, cultures, and incomes, and national origins with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." CAL. GOV'T CODE § 65040.12; CAL. PUB. RES. CODE § 30107.3; CAL. COASTAL COMM'N, *See ENVIRONMENTAL JUSTICE POLICY 19 (2019)* ([hereinafter EJ POLICY] (definition in Glossary of Terms).

<sup>3</sup> As used in this letter, the term "EJ communities" refers to disadvantaged, marginalized, and underserved communities, which include low-income communities, communities of color, and indigenous communities, that are disproportionately impacted by adverse environmental impacts and communities that have been historically excluded from accessing coastal resources. *See EJ POLICY, supra* note 2, at 4 (definition in paragraph below Environmental Justice Policy).

Plan that directly address environmental justice issues, and suggests additional, specific measures to strengthen the Commission's implementation of its EJ Policy over the next five years. Azul also identifies areas of the Draft Strategic Plan where environmental justice considerations are lacking. Azul urges the Commission to take these comments and recommendations into consideration as it prepares the Final Strategic Plan.

### **I. Azul Recommends the Strategic Plan Include Additional, Specific Measures to Promote Environmental Justice More Effectively.**

Following the passage of AB 2616 in 2016,<sup>4</sup> the Commission initiated a “three-phase approach” to integrate environmental justice principles, racial equity, and social equity throughout its work.<sup>5</sup> In the first phase, the Commission adopted the EJ Policy, and in the second phase, it began developing a Racial Equity Plan.<sup>6</sup> As the third and final phase, the Strategic Plan should contain definite, actionable measures that the Commission will take to hold itself accountable to its commitment to environmental justice and implement the EJ Policy. Azul particularly appreciates the Commission's efforts to increase public participation, meaningful engagement, and staff diversity enumerated in Goal Five of the Draft Strategic Plan, and recommends including additional, specific measures to better align the Strategic Plan with the EJ Policy.

#### **A. The Strategic Plan Should Further Promote Public Participation and Meaningful Engagement with the Commission.**

The Commission must take steps to ensure that all members of the public have opportunities to participate in the Commission's processes. The Coastal Act recognizes that, “to be effective, California's coastal protection program *requires* public awareness, understanding, support, participation, and confidence in the commission and its practices and procedures.”<sup>7</sup> Many members of EJ communities face numerous barriers to public participation and meaningful engagement. Single parent status, longer-than-average commutes, and hourly and shift employment can all hinder members of EJ communities' ability to engage with the Commission.<sup>8</sup> Objectives 5.2 and 5.3 begin to address these issues by aiming to increase meeting accessibility and reach diverse new audiences.<sup>9</sup>

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<sup>4</sup> AB 2616 confers upon the Commission the authority to specifically consider environmental justice when making permit decisions. Assemb. B. 2616, 2015–2016 Reg. Sess. (Cal. 2016).

<sup>5</sup> *Environmental Justice & Social Equity*, CAL. COASTAL COMM'N, <https://www.coastal.ca.gov/env-justice/> (last visited Feb. 7, 2020). As used in this letter, the term “equity” refers to the “fairness of achieving outcomes for all groups and no one factor, such as race, can be used to predict outcomes.” EJ POLICY, *supra* note 2, at 19 (definition in Glossary of Terms).

<sup>6</sup> EJ POLICY, *supra* note 2; *CA State Coastal Commission, LOCAL & REG'L GOV'T ALL. ON RACE & EQUITY*, <https://www.racialequityalliance.org/jurisdictions/ca-state-coastal-commission/> (last visited Feb. 7, 2020).

<sup>7</sup> CAL. PUB. RES. CODE § 30320(a) (emphasis added).

<sup>8</sup> See B.S. Offenbacher, *Overcoming Barriers to Effective Public Participation*, 70 WIT TRANSACTIONS ON ECOLOGY AND ENV'T, BROWNFIELD SITES II: ASSESSMENT, REHABILITATION & DEV. 286 (A. Donati et al. eds., 2004), <https://www.witpress.com/Secure/elibrary/papers/BF04/BF04028FU.pdf>.

<sup>9</sup> CAL. COASTAL COMM'N, PUBLIC REVIEW DRAFT OF THE 2020–2025 CALIFORNIA COASTAL COMMISSION STRATEGIC PLAN 24–25 (2019) [hereinafter DRAFT STRATEGIC PLAN].

Azul supports the promise in Objective 5.2.1 to “[m]ake Commission meetings more geographically accessible to underserved communities” by holding “at least three Commission meetings per year in more inland areas accessible by public transit,”<sup>10</sup> which mirrors the language of the EJ Policy.<sup>11</sup> However, besides holding meetings on issues that raise environmental justice concerns near EJ communities, the Commission should also schedule additional hearings, workshops, or town hall meetings on dates, at times, and in locations that are amenable to working families’ schedules. Scheduling additional events on the weekends, or in the early evenings, and in impacted communities would be especially helpful in broadening access to the Commission’s processes. Other California state agencies such as CalRecycle and the California Public Utilities Commission conduct hearings at least once a month outside of their usual meetings to improve public participation.<sup>12</sup> The Commission should join this effort to increase public participation by scheduling additional hearings that expand the opportunities for members of EJ communities to voice their opinions, particularly on issues involving environmental justice.

Azul also appreciates the Commission’s intent to “[e]xplore ways to increase meeting accessibility through technology,” stated in Objective 5.2.1.<sup>13</sup> Azul credits the Commission for accepting oral comment remotely via webcam for the first time at its November 2019 meeting.<sup>14</sup> Azul encourages the Commission to continue the use of videoconferencing technology in order to expand public participation. Furthermore, the Commission should begin accepting pre-recorded videotaped comments as contemplated by the EJ Policy,<sup>15</sup> which could be submitted to the Commission before meetings and played during appropriate oral comment opportunities. By improving access through technology, starting with the incorporation of videoconferencing technology and videotaped public comments at its meetings and workshops, the Commission can become a leader among California state agencies trying to expanding remote access options to facilitate public participation.<sup>16</sup>

Although technology should play an important role in increasing public participation, it cannot replace the use of traditional methods of outreach to communities. One study found that while most low and moderate-income families have some form of Internet connection, many—especially Latinx immigrant families—only have access through mobile devices or are inconsistently connected.<sup>17</sup> Azul appreciates the Commission’s goals in Objective 5.3 to develop

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<sup>10</sup> *Id.* at 24.

<sup>11</sup> See EJ POLICY, *supra* note 2, at 16 (item number one under Public Participation in the Implementation section).

<sup>12</sup> *CalRecycle Monthly Public Meetings*, CALRECYCLE, <https://calrecycle.ca.gov/Calendar/> (last updated Jan. 7, 2020); *CPUC Public Participation Hearings*, CAL. PUB. UTILS. COMM’N, <https://www.cpuc.ca.gov/pph/> (last visited Feb. 7, 2020).

<sup>13</sup> DRAFT STRATEGIC PLAN, *supra* note 9, at 24.

<sup>14</sup> Cal. Coastal Comm’n, *November 14, 2019*, CAL-SPAN.ORG, (Nov. 14, 2019), <https://cal-span.org/unipage/?site=cal-span&owner=CCC&date=2019-11-14#>. (participants speak from 3:50:52–4:00:26).

<sup>15</sup> EJ POLICY, *supra* note 2, at 10 (“Staff will also explore alternative manners to solicit public comment and participation, such as accepting videotaped comments.”).

<sup>16</sup> California state agencies including the California Public Utilities Commission, California Air Resources Board, California Environmental Protection Agency, CalRecycle, and the California State Water Resources Board are also seeking to use remote access options to engage a broader stakeholder pool. See CAL. PUB. UTILS. COMM’N, REMOTE ACCESS PARTICIPATION IN CPUC PUBLIC EVENTS 3-6 (2019), [https://www.cpuc.ca.gov/uploadedFiles/CPUC\\_Public\\_Website/Content/About\\_Us/Supplier\\_Diversity/Remote%20Access%20Report\\_Final.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/About_Us/Supplier_Diversity/Remote%20Access%20Report_Final.pdf).

<sup>17</sup> See VICTORIA RIDEOUT & VIKKI S. KATZ, OPPORTUNITY FOR ALL? TECHNOLOGY AND LEARNING IN LOWER-INCOME COMMUNITIES 5 (2016).

educational materials in both written and video format, provide language translation services at Commission meetings and workshops, and conduct or attend community workshops on coastal-related issues.<sup>18</sup> Although these goals reflect some of the outreach methods specified in the EJ Policy,<sup>19</sup> the Strategic Plan should present a more comprehensive approach to improve public participation and meaningful engagement given the unique challenges EJ communities face. Accordingly, the Strategic Plan should specify other outreach techniques, such as the use of social media, flyers, surveys, town hall meetings, and focus groups.<sup>20</sup> Developing robust strategies to meaningfully engage EJ communities will help ensure that the Commission's decision-making better serves the interests of all Californians.

### **B. The Strategic Plan Should Define Staff Retention and Advancement Strategies that Promote Diversity, and Provide the Public with a Draft Racial Equity Plan.**

Azul commends the Commission's efforts to increase staff diversity included in Objective 5.4 of the Draft Strategic Plan. Azul particularly appreciates that Objective 5.4 specifically identifies recruitment practices intended to improve diversity. These include critically assessing job posting and outreach procedures, including racial equity work in job duties, creating a racial equity onboarding packet, and seeking funding to develop an internship program geared toward individuals from diverse cultural and socioeconomic backgrounds.<sup>21</sup> However, Objective 5.4 does not adequately address staff retention and advancement strategies beyond references to Objectives 1.1 and 1.2, which delineate general retention strategies.<sup>22</sup> Azul recommends that Objective 5.4 outline a progressive approach to improving diversity and inclusion that uses tools such as segmented engagement surveys, focus groups, and personal conversations to identify barriers to retention and advancement,<sup>23</sup> followed by the establishment of mentoring programs and employee resource groups that address those barriers.<sup>24</sup> Including these measures in the Strategic Plan will help the Commission take precise steps toward achieving racial and social equity in its internal operations.

Azul also commends the Commission's efforts to address institutional racism and unconscious bias through Objective 5.5 of the Draft Strategic Plan, which seeks to expand staff training opportunities on social justice and racial equity issues. Azul appreciates the Commission's work through the Government Alliance for Racial Equity, especially the training that the racial equity team completed in 2018.<sup>25</sup> Azul is concerned that while Objective 5.5.2 of

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<sup>18</sup> DRAFT STRATEGIC PLAN, *supra* note 9, at 24–25.

<sup>19</sup> See EJ POLICY, *supra* note 2, at 17 (“Encourage broader participation by creating materials and supporting community workshops to show residents how to participate at Commission meetings.”); *id.* at 6, 10 (listing need for language translation services).

<sup>20</sup> The EJ Policy specifically includes these forms of public outreach. *Id.* at 6. For other useful forms of public outreach, see generally INT’L ASS’N FOR PUB. PARTICIPATION, IAP2’S PUBLIC PARTICIPATION TOOLBOX (2006).

<sup>21</sup> DRAFT STRATEGIC PLAN, *supra* note 9, at 25.

<sup>22</sup> *Id.* at 11–12, 25.

<sup>23</sup> See Karen Brown, *To Retain Employees, Focus on Inclusion—Not Just Diversity*, HARV. BUS. REV. (Dec. 4, 2018), <https://hbr.org/2018/12/to-retain-employees-focus-on-inclusion-not-just-diversity>.

<sup>24</sup> See generally Beronda L. Montgomery, *Mapping a Mentoring Roadmap and Developing a Supportive Network for Strategic Career Advancement*, 7 SAGE OPEN 2 (2017); *Employee Resource Groups*, DIVERSITY BEST PRACTICES (Mar. 6, 2018), <https://www.diversitybestpractices.com/employee-resource-groups>.

<sup>25</sup> See LOCAL & REG’L GOV’T ALL. ON RACE & EQUITY, *supra* note 6.

the Draft Strategic Plan commands the Commission to “[i]mplement the agency-wide Racial Equity Action Plan,”<sup>26</sup> no such plan has been shared with the public. This is despite the fact that the Commission aimed to complete a Draft Racial Equity Plan in 2019 as part of the EJ Policy’s “immediate next steps.”<sup>27</sup> The Commission should clarify why the Racial Equity Plan, as the second phase of the Commission’s “three-phase approach” to integrate environmental justice principles, racial equity, and social equity throughout the Commission’s work, was not completed and circulated to the public before the Draft Strategic Plan.<sup>28</sup> Azul urges the Commission to include, in the Strategic Plan, a timeline for the completion and implementation of the Racial Equity Plan, and a commitment to share a draft with the public and solicit feedback.

## **II. The Strategic Plan Should Include Specific Efforts Aimed at Increasing and Safeguarding Coastal Access for EJ Communities.**

Objectives 2.1–2.4 of the Draft Strategic Plan reflect the Commission’s commitment under its EJ Policy to “[implement] a longer-term strategy to increase the number and variety of new lower-cost opportunities” for public access to the coast.<sup>29</sup> To achieve this environmental justice goal, the Commission must understand the unique needs of EJ communities, particularly those communities from inland California who have the least access to the coast. The Strategic Plan should state that the Commission will engage EJ communities and representatives, and will collaborate with inland governments where EJ communities reside. The Commission could achieve this, for example, by assembling committees that include individuals representing environmental justice communities, organizations that work closely with EJ communities, coastal governments, and inland governments.<sup>30</sup>

By collaborating with EJ communities and organizations that work closely with them, the Commission can better understand the unique coastal access needs of EJ communities. The Commission can then work with coastal and inland governments to encourage implementation of transit systems and other infrastructure that provides affordable coastal access for these EJ communities. Indeed, “[s]olving these complicated challenges [of public access] will require communities and leaders from coastal *and inland communities* . . . as well as the Coastal Commission . . . to work together to fulfill the promise of the Coastal Act in the future.”<sup>31</sup> Therefore, Objectives 2.1–2.4 of the Strategic Plan should specify that the Commission will

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<sup>26</sup> DRAFT STRATEGIC PLAN, *supra* note 9, at 25 (emphasis added).

<sup>27</sup> EJ POLICY, *supra* note 2, at 17.

<sup>28</sup> See CAL. COASTAL COMM’N, *supra* note 5.

<sup>29</sup> EJ POLICY, *supra* note 2, at 7.

<sup>30</sup> For example, AB 617 is a bill that directs the California Air Resources Board (CARB) “to take measures to protect communities disproportionately impacted by air pollution.” *AB 617 Background*, SACRAMENTO METRO. AIR QUALITY MGMT. DIST., <http://www.airquality.org/air-quality-health/community-air-protection/ab-617-background> (last visited Feb. 12, 2020); see Assemb. B. 617, 2016–2017 Reg. Sess. (Cal. 2017). To implement AB 617, CARB convened a multi-stakeholder Consultation Group that includes “individuals representing environmental justice organizations, air districts, industry, academia, public health organizations, and local government.” *Community Air Protection Program Consultation Group*, CAL. AIR RES. BD., <https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program-ab617/community-air-protection-program-consultation-group> (last visited Feb. 12, 2020).

<sup>31</sup> JON CHRISTENSEN & PHILIP KING, ACCESS FOR ALL: A NEW GENERATION’S CHALLENGES ON THE CALIFORNIA COAST 2 (2017), <https://www.ioes.ucla.edu/wp-content/uploads/UCLA-Coastal-Access-Policy-Report.pdf> (emphasis added).



assemble committees for the purpose of collaborating with EJ communities and coastal and inland governments to increase and safeguard access to the coast for EJ communities.

### **III. The Strategic Plan Should Incorporate Environmental Justice More Robustly into Planning and Permitting Programs.**

#### **A. The Strategic Plan Should Clarify in Objective 5.1 that Local Governments and Commission Staff Are Required to Implement Environmental Justice Policies.**

Azul commends the Commission for including in the Draft Strategic Plan commitments to “[d]evelop guidance for staff to identify and address environmental justice issues in permit review,”<sup>32</sup> and “[d]evelop a guidance memo for staff and local governments to assist with the incorporation of environmental justice policies into Local Coastal Programs.”<sup>33</sup> Azul recommends that the Strategic Plan include a specific timeline for the development of guidance materials, including deadlines specifying when the Commission will publish drafts for public review and comment, and a deadline to adopt the final versions. Including a specific timeline will facilitate more immediate redress of environmental injustice, maintain transparency, and hold the Commission accountable to its commitments.

Azul also requests that the Strategic Plan go further by committing the Commission to undertake rulemaking to adopt regulations pursuant to the Administrative Procedure Act, Gov. Code §§ 11346-11348, requiring the consideration of environmental justice in permit and LCP processes. By formally adopting environmental justice regulations for CDPs and LCPs, the Commission can provide clear requirements for permittees and local governments, and enshrine principles of environmental justice in agency decision-making.<sup>34</sup>

#### **B. The Strategic Plan Should Address Environmental Justice Alongside Climate Change and Sea Level Rise Issues During Permitting and Planning.**

The Commission’s EJ Policy promises that the Commission “will . . . continue to recommend considering environmental justice when analyzing sea level rise impacts in planning and permitting decisions as stated in its adopted Sea Level Rise Policy Guidance.”<sup>35</sup> However, Objectives 4.1 and 4.2 of the Strategic Plan, which address risks from climate change and sea level rise in relation to permitting and planning, do not mention considerations of environmental justice alongside those risks.<sup>36</sup> In light of the Commission’s EJ Policy, the Strategic Plan should specify that environmental justice will be considered alongside the risks posed by climate change and sea level rise during planning and permitting.

Azul is particularly alarmed that the Draft Strategic Plan fails to mention considerations of environmental justice along with climate-driven impacts during planning and permitting because climate change and sea level rise will disproportionately impact EJ communities. In fact,

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<sup>32</sup> DRAFT STRATEGIC PLAN, *supra* note 9, at 24.

<sup>33</sup> *Id.*

<sup>34</sup> Of course, the Commission need not, nor should it wait to incorporate environmental justice principles in permitting decisions.

<sup>35</sup> EJ POLICY, *supra* note 2, at 11.

<sup>36</sup> DRAFT STRATEGIC PLAN, *supra* note 9, at 20–21.

the Commission’s EJ Policy recognizes that “[c]limate change and sea level rise hazards will have disproportionate impacts on communities with the least capacity to adapt and may exacerbate existing environmental injustices and cumulative impacts from other environmental hazards,”<sup>37</sup> and that “[l]ow-income communities are more vulnerable to climate-driven water quality and supply issues that can result from seawater intrusion, contamination from extreme storm events, and drought.”<sup>38</sup> Indeed, droughts disproportionately affect low-income communities by increasing costs of water, creating serious affordability issues for EJ communities.<sup>39</sup> The Commission also concedes that “[t]he expense of sea level rise adaptation measures for coastal communities could also heighten displacement of disadvantaged populations by increasing living expenses for sewer and water services.”<sup>40</sup> To reflect the Commission’s understanding that EJ communities are disproportionately impacted by climate change and sea level rise, and that EJ communities have “the least capacity to adapt” to these impacts, the Strategic Plan should specify that consideration of EJ communities is required when examining climate-driven impacts during planning and permitting. Doing so will ensure that the Commission can work to mitigate those impacts during its planning and permitting decision-making.

#### **IV. The Strategic Plan Should Prioritize Informing EJ Communities About the Risks of Climate Change.**

The Draft Strategic Plan states that the Commission will “[i]ncrease the public’s awareness of climate change issues,”<sup>41</sup> and “develop and implement a targeted outreach and education campaign to inform the public of the risks posed by climate change,”<sup>42</sup> but does not specify that its efforts will target or prioritize EJ communities. Climate change poses heightened risks for EJ communities, including danger of displacement,<sup>43</sup> decreased access to clean and affordable water,<sup>44</sup> and harm from an increasingly warm climate.<sup>45</sup> Not only do EJ communities face heightened risks from climate change, but also barriers that can exacerbate the harm like limited English proficiency and lack of access to formal education.<sup>46</sup> Because EJ communities are disproportionately impacted by climate change and simultaneously face barriers that limit access to information about those impacts, the Strategic Plan should prioritize EJ communities in its outreach and education campaign outlined in Objective 4.6. By understanding the risks of

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<sup>37</sup> EJ POLICY, *supra* note 2, at 11.

<sup>38</sup> *Id.*

<sup>39</sup> See HEATHER COOLEY ET AL., DROUGHT AND EQUITY IN THE SAN FRANCISCO BAY AREA 7 (2016), [https://pacinst.org/wp-content/uploads/2016/06/drought\\_and\\_equity\\_in\\_the\\_san\\_francisco\\_bay\\_area-5.pdf](https://pacinst.org/wp-content/uploads/2016/06/drought_and_equity_in_the_san_francisco_bay_area-5.pdf); see generally Ellen Hanak, *The High Cost of Drought for Low-Income Californians*, PUB. POLICY INST. CAL., (June 18, 2015), <https://www.ppic.org/blog/the-high-cost-of-drought-for-low-income-californians/>.

<sup>40</sup> EJ POLICY, *supra* note 2, at 11.

<sup>41</sup> DRAFT STRATEGIC PLAN, *supra* note 9, at 23.

<sup>42</sup> *Id.*

<sup>43</sup> See EJ POLICY, *supra* note 2, at 11.

<sup>44</sup> *Id.*

<sup>45</sup> Meg Anderson & Sean McMinn, *As Rising Heat Bakes U.S. Cities, the Poor Often Feel it the Most*, NPR (Sept. 3, 2019, 5:00 AM), <https://www.npr.org/2019/09/03/754044732/as-rising-heat-bakes-u-s-cities-the-poor-often-feel-it-most> (noting that EJ communities are disproportionately impacted by hotter climates caused by climate change, which “can have dire and sometimes deadly health consequences.”); see EJ POLICY, *supra* note 2, at 11.

<sup>46</sup> EJ POLICY, *supra* note 2, at 6.

climate change, EJ communities can be better prepared to face climate change's detrimental impacts.

The Strategic Plan should also state that the Commission will prioritize EJ communities in Objective 4.6 by incorporating Azul's suggestions regarding outreach provided in Section I.A of this letter, such as conducting community workshops, providing language translation services at meetings, and providing educational materials in both written and video format available in different languages. Also, similar to Azul's recommendations in Section II, the Commission should develop committees including representatives of EJ communities and nonprofit organizations to allow the Commission to understand how to best inform EJ communities about the risks of climate change.

## **V. The Strategic Plan Should Include Specific Commitments Aimed at Promoting and Protecting Affordable Housing.**

Currently, low-income households living along California's coast are actively moving inland in search of more affordable housing.<sup>47</sup> Examples of this are demonstrated by EJ communities that can no longer afford to live in coastal cities in the San Francisco Bay Area<sup>48</sup> and in Long Beach.<sup>49</sup> In its EJ Policy, "the Commission recognizes that the elimination of affordable residential neighborhoods has pushed low-income Californians and communities of color further from the coast," and promises to promote new and existing affordable housing.<sup>50</sup> The Commission also stated in its EJ Policy that it would "[s]eek legislation to restore Coastal Act policies regarding affordable housing."<sup>51</sup> Since the lack of affordable coastal housing, in effect, limits EJ communities' access to the coast, the Strategic Plan should advance the EJ Policy by stating that the Commission will seek legislative action to restore Coastal Act authority regarding affordable housing, as promised.

Previously, the Commission had authority to require inclusion of affordable housing units in the coastal zone. Mary Shallenberger, who worked for the Legislature from 1984–2004 and served as a Commissioner for thirteen years, describes the Commission's accomplishments under its original authority to protect affordable housing: "[T]he commission successfully required the construction of over 5,000 affordable, deed-restricted, owner-occupancy and rental units in high-priced areas such as Laguna Nigel, San Clemente and Dana Point. It also collected about \$2

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<sup>47</sup> Brian Uhler, *Lower-Income Households Moving to Inland California from Coast*, LEGIS. ANALYST'S OFF., (Sept. 16, 2015), <https://lao.ca.gov/LAOEconTax/Article/Detail/133>.

<sup>48</sup> See, e.g., Kiley Russell, *Bay Area Gentrification Displacing Communities*, MERCURY NEWS, (Aug. 6, 2019, 8:27 AM), <https://www.mercurynews.com/2019/08/06/bay-area-gentrification-displacing-communities-of-color/> (finding that "66 percent of the Bay Area's low-income African American households" and "55 percent of the region's low-income Latino households are facing [gentrification] pressures, as are 48 percent of low-income Asian or Pacific Islander households and 50 percent of the Bay Area's low-income Native American households, according to the atlas, a partnership between PolicyLink, the San Francisco Foundation and the University of Southern California's Program for Environmental and Regional Equity."); see also Eillie Anzilotti, *Coastal Cities are Already Suffering from "Climate Gentrification"*, FAST CO., (July 7, 2018), <https://www.fastcompany.com/90204840/coastal-cities-are-already-in-the-grips-of-climate-gentrification>.

<sup>49</sup> See, e.g., Joshua Frank, *As Long Beach Luxury Development Booms, the Poor Get Left Behind*, OC WKLY. (Dec. 13, 2018), <https://www.ocweekly.com/as-long-beach-luxury-development-booms-the-poor-get-left-behind/>; see also Anzilotti, *supra* note 48.

<sup>50</sup> EJ POLICY, *supra* note 2, at 8.

<sup>51</sup> *Id.* at 16.

million in in-lieu fees for additional housing opportunities throughout the state.”<sup>52</sup> If the Legislature restored the Commission’s original authority under the Coastal Act, the Commission could require construction of affordable housing units in coastal cities. In effect, the Commission could help curb the migration of EJ communities from coastal cities to inland California caused by the lack of affordable housing.

Notably, the Governor has prioritized securing affordable housing in coastal cities.<sup>53</sup> For example, at his request, the State filed a lawsuit against Huntington Beach over the city’s alleged failure to develop the number of affordable housing units required by state housing laws.<sup>54</sup> If the Commission regained its authority to promote affordable housing in the coastal zone, the Commission could mandate inclusion of affordable housing, and help advance the State’s efforts to combat the housing crisis.

### **Conclusion**

Azul respectfully requests that the Commission amend the Draft Strategic Plan for 2020–2025 to incorporate the comments and recommendations provided above. The development of a new Strategic Plan is an opportunity for the Commission to define the goals and actions it will take to meet the commitments made in its EJ Policy, and advance the Commission’s mission of “protecting and enhancing California’s coast and ocean for present and future generations.”<sup>55</sup> The Commission should include specific measures that directly address environmental justice issues throughout the Strategic Plan in order to hold itself accountable to its policies, and inform the public of what can be expected of the Commission in the coming years. Azul thanks the Commission for its efforts to incorporate environmental justice into its work, and looks forward to continued collaboration with the Commission to achieve environmental justice and equitable coastal management for all Californians.

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<sup>52</sup> Mary Shallenberger, *Return the Coastal Commission’s Authority to Help Relieve the Affordable Housing Crisis*, OC REGISTER, (Feb. 8, 2019, 10:23 AM), <https://www.oregister.com/2019/02/08/return-the-coastal-commissions-authority-to-help-relieve-the-affordable-housing-crisis/>; *see id.* (noting that the Commission had this authority until 1981, when “a coalition of anti-housing interests supported a bill to strip that authority, which brought affordable housing along the coast to a halt, and “thousands of units slated to break ground never materialized”).

<sup>53</sup> *See* Priscilla Vega, *L.A. Judge Denies Huntington Beach’s Request to Dismiss State’s Housing Lawsuit*, LA TIMES, (Aug. 8, 2019), <https://www.latimes.com/socal/daily-pilot/news/story/2019-08-08/l-a-judge-denies-huntington-beachs-request-to-toss-out-housing-suit-filed-by-state>; *see also* Bryan Anderson & Madeline Ashmun, *Gavin Newsom’s Housing Lawsuit Put 47 California Cities on Notice. Is Yours on the List?*, SACRAMENTO BEE, (Feb. 19, 2019, 12:00 AM), <https://www.sacbee.com/news/politics-government/capitol-alert/article226293135.html>.

<sup>54</sup> *See* Vega, *supra* note 53.

<sup>55</sup> *Our Mission*, CAL. COASTAL COMM’N, <https://www.coastal.ca.gov/whowere.html> (last visited Feb. 7, 2020).



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Marce Gutiérrez-Graudiņš  
Founder and Director  
Azul



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Clinical Professor of Law  
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UC Irvine School of Law



**From:** [Amy Lovid](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Comments  
**Date:** Friday, February 14, 2020 4:03:29 PM

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Honorable Commissioners,

First, let me say that the Strategic Plan is very well organized and written with unusual vigor, as befits the storied history of the Coastal Act and the Commission.

In view of the torrent of comments you will likely receive, I will focus on a single strategic idea.

Much of the document focuses on the objectives that are not being achieved, for example the absolutely essential work of enforcement of the Act, with a backlog that continues to grow, despite both increased funding and expanded authority given to the Commission.

As a strategy, this is simply unacceptable.

Fortunately, it is a problem entirely within the Commission's ability to solve. It is imperative for you to reallocate existing resources to this crucial need. Many of the initiatives proposed in the Strategic Plan are lower priority or outside the four corners of the authority of the Commission. To cite just one example, applying the "precautionary principle" (pg. 8) is found nowhere in the Act, yet it is emblematic of the excess of subjective criteria your staff imposes upon local governments trying to complete or improve their Local Coastal Plans, causing unacceptable delay and wasted effort of all involved. The Strategic Plan cites an increasing LCP workload in the face of the completion of LCPs, but that is due to unnecessary, unwarranted and obsessive intrusion into the local coastal planning process set out under the Act.

Making decisions that stretch and exceed the Commission's authority in one instance, and then setting that as the standard for all subsequent actions is a grievous mistake. The Coastal Act is not a cookie-cutter. Rather the Act envisioned a partnership where State goals are accomplished by cities and counties tailoring them to the diversity of their own particular local conditions. In too many cases this has instead devolved into the Commission acting as a king, ruling over local governments as its disenfranchised subjects

This is the Commission's most egregious and regrettable strategic failing.

It is an urgent hope the final Strategic Plan will rectify that.

Sincerely,

Amy B. Lovid  
[a.b.lovid@gmail.com](mailto:a.b.lovid@gmail.com)

**From:** [Raquel Juarez](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Comments on the 2020-2025 Strategic Plan  
**Date:** Friday, February 14, 2020 4:14:18 PM

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To whom this may concern;

I am a concerned citizen and am writing to ask that you consider the following:

1. Under **Objective 2.3 Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast**

Please add 2.3.4 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

2. **Objective 2.4 Encourage Lower-Cost Visitor-Serving Opportunities and Facilities.**

Please add 2.4.3 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

Thank you so much for your help in this matter!!

Raquel Juarez

**From:** [Linda Briggs](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Cc:** [Linda Briggs](#)  
**Subject:** Comments on the 2020-2025 Strategic Plan  
**Date:** Friday, February 14, 2020 4:17:34 PM

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To: Coastal Commission  
Re: Public Review Draft of the 2020-2025 California Coastal Commission Strategic Plan

Please include these changes in order to increase access to the coast for the millions of Californians and visitors with dogs:

1. Under **Objective 2.3 Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast**

Given the vastly increased number of people who own dogs, live in small spaces such as apartments and condos, and enjoy exercising their pets outdoors, please add 2.3.4 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

2. **Objective 2.4 Encourage Lower-Cost Visitor-Serving Opportunities and Facilities.**

For the same reason, please add 2.4.3 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

Thank you for your consideration,

Linda L. Briggs  
4756 Biona Dr.  
San Diego, CA 92116  
(619) 528-8545  
[LBriggs@LindaBriggs.com](mailto:LBriggs@LindaBriggs.com)

**From:** [Michael Candra](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Comments on the 2020-2025 Strategic Plan  
**Date:** Friday, February 14, 2020 4:19:45 PM

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To whom it may concern;

I am a concerned citizen and am asking that you consider these points in your development project.

1. Under **Objective 2.3 Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast**

Please add 2.3.4 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

2. **Objective 2.4 Encourage Lower-Cost Visitor-Serving Opportunities and Facilities.**

Please add 2.4.3 Support designation of areas that allow for recreation for people with their dogs on leash and off leash.

Thank you for your time,

Michael Candra



February 14, 2020

via email StrategicPlanComments@coastal.ca.gov

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

**Subject: Public Comment for Public Review Draft California Coastal Commission Strategic Plan 2020-2025**

To the California Coastal Commission:

Greenspace - The Cambria Land Trust is grateful for the opportunity to comment on the California Coastal Commission Strategic Plan Public Review Draft 2020-2025. Greenspace's mission is to protect and enhance the San Luis Obispo County's North Coast area's ecological systems, cultural resources and marine habitats through land acquisition and management, public education, and advocacy.

Greenspace supports all of the efforts that the California Coastal Commission have done to protect California's coastal zones. Listed below are key efforts we support in the 2020-2025 Strategic Plan:

*I. 7.1 Expanding and Enhance the Enforcement Program*

Based on Greenspace's over 30 years of experience, the support of the Coastal Commission when it comes to enforcement is our primary need. In light of the Governor's Executive Orders and Emergency Proclamations over the last few years -- now more than ever -- the strongest emphasis in the execution of the Strategic Plan must be on resources for the Enforcement Program.

*II. 3.8.3 Work closely with State Water Boards, local governments, and other agencies partners to focus attention on improving water quality in California's Critical Coastal Area watersheds*

THE GREENSPACE BOARD OF DIRECTORS

Andrea Wogsland  
Executive Director  
PO Box 1505, Cambria CA 93428  
805 927-2866 (v)  
greenspacecambria.org  
info@greenspacecambria.org

Mary Webb, President  
Amanda Gowdy, Vice President  
Dewayne Lee, Treasurer  
Robert Reid, Secretary  
John Zinke  
Art Van Rhyn

Wayne Attoe  
Ellen Leigh  
Bob Fountain  
Richard Hawley  
Deborah Parker, Director Emeritus





- III. *4.1.4. Work with local governments, stakeholders and the public and through regional climate collaboratives to address regional and local sea level rise vulnerabilities in updates to LCPs*
- IV. *4.4.2 Using best available science to develop guidance on climate change adaptations strategies for providing/maintaining open space areas where ESHA, wetlands and other critical coastal habitats can migrate*
- V. *4.5.2 Facilitating the reduction of greenhouse gas emissions by requiring sustainable development standards and smart growth land use planning strategies in LCPs and coastal permits*

### Specific Comments

5.2. Greenspace - The Cambria Land Trust supports the effort of reducing barriers to public participation by increasing meeting accessibility, yet in order to increase public participation other barriers have to be addressed. Increasing meeting accessibility through technology and adjusting meeting times may be one avenue, however, some members of the public are not inclined to voice their opinion in a public setting. Developing an online portal where the public can leave comments anonymously would create another way for constituents to give comments.

5.2.2 Greenspace - The Cambria Land Trust feels that the stated “disadvantaged communities” needs to be precisely defined by developing personas of who the Coastal Commission is trying to reach, then craft strategies to increase public participation.

6.3. Increasing transparency of the status of CDP application materials in the pipeline from local government to the Coastal Commission would enhance the public’s ability to participate in the process.

We are available to discuss our comments and recommendations. Thank you for providing the opportunity to contribute during this phase.

Sincerely,

Andrea Wogsland  
Executive Director

**From:** [Christine Heinrichs](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** Strategic Plan comments  
**Date:** Friday, February 14, 2020 5:01:24 PM

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California Coastal Commission

Executive Division

45 Fremont Street, Suite 2000

San Francisco, CA 94105

[StrategicPlanComments@coastal.ca.gov](mailto:StrategicPlanComments@coastal.ca.gov)

To the Coastal Commission:

Thank you for this opportunity to comment on the draft Strategic Plan. It's an inspiring document. My congratulations on presenting a document that leads into the future.

The Plan makes the case for increased financial and political support for the Commission. The emphasis on diversity, both within the Commission board and staff and in outreach to the public, is crucial to success of your mission of saving the coast.

The Coastal Commission wields significant power and influence. It requires the highest level of scientific and legal advice to stand with the other federal and state agencies that affect coastal resource decisions, such as the NOAA Office of Coastal Management, State Coastal Conservancy, State Parks, State Lands Commission, San Francisco Bay Conservation and Development Commission, the Ocean Protection Council, Department of Fish and Wildlife, Office of Planning and Research, Office of Emergency Service, CalFire, Caltrans, and State Water Quality Control Boards.

Guided by your Vision:

The coast endures as a vital part of California's social and cultural fabric and the coastal and ocean economy is strong.

Your nine goals are thoughtful and comprehensive:

Goal 1: Enhance Agency Capacity and Maintain an Effective and Diverse Workforce

New investment in the agency is needed to fully meet the needs of the LCP planning

program and the state-local partnership.

#### Goal 2: Maximize Public Access and Recreation for All

Thank you for making this a top priority. This relates to the important goal of diversity, within the agency and in its service to the people of California.

California Coastal Trail. Boucher Trail.

#### Goal 3 Protect and Enhance Coastal Resources

The significance of transitioning to low- and no-emission energy technology will affect every aspect of the coast. Wind and wave technology will likely be part of this transition. Each project needs to be thoroughly vetted, including the onshore support facilities that will be required. This needs to be included in the Plan.

The coast is under pressure to allow more on-shore and off-shore oil and gas drilling. Don't allow it. Make that a priority in the Plan.

Fog technology presents a possible source of water. The Plan should be flexible enough to encourage such innovative uses.

#### Goal 4: Support Resilient Coastal Communities in the Face of Climate Change and Sea Level Rise

In San Simeon, the Wastewater Treatment Plant is on the beach, and includes an ocean outfall. This needs to be addressed sooner rather than later. Delaying changes for years has only resulted in deferred solutions that may have higher costs. Constructed wetlands have been used in other parts of the state and might be especially suited to this rural part of the coast. The Plan should emphasize low-impact technology over expensive high-tech projects.

Cambria's Emergency Water Supply project is an example of how emergency permits can be misused. It was constructed under an emergency permit from the county and has caused many problems for Cambria. Financial problems dog the project, which has put the community millions of dollars in debt. Built in unmapped ESHA, the project's Brine Impoundment Pond flooded in 2018, triggering a Cease & Desist Order from the RWQCB. It is currently the subject of a \$3.5 million lawsuit by the Cambria CSD against the contractor.

Better control over emergency permits and oversight of projects must be included in the Plan. Brine waste from the EWS is now proposed to be trucked to South County Waste Disposal for pumping into the ocean. This needs close regulation. The suggestion that the San Simeon ocean outfall be used for brine waste disposal must be clearly prohibited.

#### Goal 5: Advance Diversity, Equity, Environmental Justice, and Tribal Relations

The Commission is charged with the delicate and difficult balance of many interests. Protecting coastal resources while allowing beach access is perhaps the most challenging. In south San Luis Obispo County, the Oceano Dunes remain a difficult thorn. While the people of Oceano, lower income and mainly Hispanic, rely on the dunes for livelihood, the dust problem on the Nipomo Mesa is unacceptable. This long-standing issue has gone on too long. The Commission needs to address it as a leader in this sensitive balance. Good luck. I wish I had the magic formula.

Especially sensitive and valuable, even unique, areas of San Luis Obispo County include the Morro Bay Estuary and Pirate's Cove\Cave Landing, as well as the Oceano Dunes. The transition of Diablo Canyon Nuclear Power Plant to a decommissioned facility presents opportunity for land preservation. Proposals to repurpose this as a desalination facility should be addressed. It's been a protected area and presents the Commission with an opportunity for pristine preservation.

## Goal 6: Continue to Enhance the LCP Planning Program and Refine Implementation of the Regulatory Program

On the Central Coast, The Commission's leadership is needed to protect coastal resources from local exploitation. San Luis Obispo County's LCPs are subject to bureaucratic and political whims. The process for revising them needs scrutiny from the Coastal Commission to keep the county LCPs in conformance with the state's goals. San Luis Obispo County has revised its Resource Management System regulations, in a confusing process that affects the county LCPs.

Goal 7: Expand and Enhance the Enforcement Program Cambria's CSD continues to approve construction permit applications, despite lack of adequate water, which are then granted by SLO County. While the Commission's process has limited some development, the creeks remain at risk in this process.

Mitigation funds are collected from various projects, but accountability is difficult to follow. Addressing the use of those funds, and making it transparent to account for them, is important to applying the funds to environmental uses, which lack the voice that commercial interests exert.

San Luis Obispo has been troubled by its Coastal Commission representative holding ex parte meetings and not being adequately disciplined. The plan should hold Commissioners to the highest standard to preserve public faith in the Commission.

## Goal 8: Continue to Develop and Maintain Partnerships and Enhance Public Presence

As an elephant seal docent for more than 12 years, and this year a Winter Guide to help visitors manage to enjoy the beach along with adult elephant seal bulls, I welcome the Coastal Commission's work to support access to all of California's coastline.

<https://www.sanluisobispo.com/news/local/community/cambrian/article238593258.html>

## Goal 9: Enhance Information Management and E-Government

It will help to expand access to meetings to all Californians. Making materials available in all formats and other languages. Public education is why I am a docent. Technology can be a blessing or a curse. Please consider user-friendly systems. Better maps and aerial photography can help.

I'm convinced that when people know what they have to lose, they will step up to save it. The coast is never saved, it is always being saved.

Thank you for this opportunity.

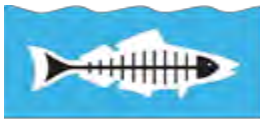
Christine Heinrichs

1800 Downing Ave.

Cambria CA 93428

--

Christine Heinrichs



Heal the Bay

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February 14<sup>th</sup>, 2020

California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**RE: California Coastal Commission 2020-2025 Strategic Plan**

*Submitted electronically via StrategicPlanComments@coastal.ca.gov*

Dear California Coastal Commission and Staff,

Heal the Bay is a non-profit environmental organization with 35 years of experience and 15,000 members dedicated to making the coastal waters and watersheds of Greater LA safe, healthy and clean. On behalf of Heal the Bay, we would like to thank the California Coastal Commission (Commission) and staff for their diligence in drafting California Coastal Commission 2020-2025 Strategic Plan (Strategic Plan). Heal the Bay has a long history of working closely with the Commission on issues of public access and coastal resource protection and has a vested interest in the continued success and improvement of the Commission and its goals.

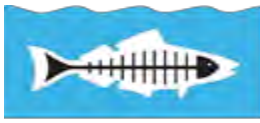
After careful review of this draft of the Strategic Plan, we would first like to commend staff for the expanded and comprehensive goals, objectives and actions laid out to maximize coastal access, manage coastal and marine habitat, improve inclusivity and justice, and address climate change. Heal the Bay's major organizational goals are to cultivate thriving oceans and healthy watersheds through adaptive, equitable and science-based management and to incorporate environmental justice into all our work, and the Strategic Plan aligns closely with those goals. We respectfully offer commendations and commentary on the following four goals of the Strategic Plan:

1. **Goal 1:** Enhance Agency Capacity and Effectiveness
2. **Goal 2:** Maximize Public Access and Recreation for All
3. **Goal 3:** Protect and Enhance Coastal Resources
4. **Goal 4:** Support Resilient Coastal Communities in the Face of Climate Change and Sea Level Rise
5. **Goal 5:** Advance Diversity, Equity, Environmental Justice, and Tribal Relations

*Goal 1: Enhance Agency Capacity and Effectiveness*

We would firstly like to recognize the goals and objectives laid out in this work plan specifically dedicated to help increase efficiency and capacity at the California Coastal Commission. Based on our experience with the Commission and the most recent executive report from the Commission's Executive Director delivered at the Commission's meeting on February 12<sup>th</sup>, 2020, it is clear that Commission staff are currently overwhelmed and in need of direct actions to address lack of funding and personnel. While we will focus the remainder of our comments on specific subject areas and substantive work plan goals, we would like to express support for the steps the Commission, and hopefully the State Legislature, are committing to take to address major workflow concerns in the Strategic Plan. The objectives laid out under this goal to realign priorities of the agency with necessary staffing and compensation, increase staff satisfaction and retention, standardize training, and support professional development are essential to achieving all other goals in the Strategic Plan.





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### *Goal 2: Maximize Public Access and Recreation for All*

The Commission was founded to protect and maximize public access to the coast for all Californians, as is their right under the Coastal Act.<sup>1</sup> This goal not only lays out actions to continue protecting this right, but also expands on the previous 2013-2018 plan to maximize public access and recreation for all Californians. We appreciate the enhancement of this goal and its actions and we would like to thank the Commission for including Objective 2.3: *Remove Barriers to Public Access and Develop Programs to Bring More People to the Coast*. While the plan references additional objectives in Goal 5 to address inequities in coastal access, we recommend that staff further **strengthen this objective by including a specific action item to increase coastal access for overburdened and historically disadvantaged communities.**

We offer the following language suggestion for this additional action item under Objective 2.3: ***“2.3.4 Work with agency partners, WHALE TAIL grantees and local governments to prioritize increased access and barrier removal for overburdened and historically disadvantaged communities.”***

### *Goal 3: Protect and Enhance Coastal Resources*

As an environmental organization dedicated to protecting our local coastline, we are supportive of the expansion of this goal and specifically the addition of *Objective 3.5: Reduce Plastic Pollution and All Other Marine Debris*. For decades, Heal the Bay has been heavily involved in the fight against plastic pollution and we agree with the Commission that this issue must be addressed in the Strategic Plan with its own objective and action items. We would like to encourage the commission to continue and expand upon current interagency collaboration on this objective and continue to support state bills such as Senate Bill 54 and Assembly Bill 1080 (also known as the California Circular Economy and Pollution Reduction Act) to reduce plastic pollution through a comprehensive approach.

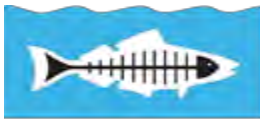
We offer the following language suggestion for an additional action item under Objective 3.5: ***“3.5.6 Expand interagency partnership and engage directly with statewide legislation that comprehensively addresses plastic pollution and marine debris and its associated impacts.”***

We recommend that the commission further strengthen Goal 3 by increasing the integration of coastal protection objectives with marine protected area (MPA) management. In the previous iteration of this Strategic Plan, MPAs were integrated into a number of different objectives, including interagency coordination to protect ocean resources, the development of guidance and protocols for MPA management, and mitigating development impacts on water quality.<sup>2</sup> In this Strategic Plan, MPA management is included in *Objective 3.8: Avoid and Mitigate Adverse Impacts of Development on Water Quality* but we believe MPA integration could be much stronger. **We recommend coordinating the implementation of environmentally sensitive habitat area, habitat restoration, public access, and coastal development with MPA management and making this its own objective in the new Strategic Plan.** California’s network of MPAs is an invaluable method of protecting whole ecosystems and building resiliency to climate change and other stressors on our coasts. Effective management of these MPAs must include cross-cutting goals that integrate MPAs with all other coastal management conducted by the Commission.

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<sup>1</sup> California Coastal Act of 1976, Section 30001.5

<sup>2</sup> California Coastal Commission Strategic Plan 2013-2018, Goal 2: Protect Coastal Resources, Objective 2.4 and Objective 2.2



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We offer the following language suggestion for this additional objective: “***Objective 3.9 Coordinate implementation of all coastal resource protection activities with the management of the State Marine Protected Area Network.***”

We recommend this objective include the following action items

- ***3.9.1 Integrate marine protected area boundaries and regulations into the coastal development permitting process.***
- ***3.9.2 Coordinate the implementation of environmentally sensitive habitat areas with the existing management of the marine protected area network.***
- ***3.9.3 Ensure public access for recreation to coastal marine protected areas through barrier removal and increased access points.***
- ***3.9.4 Integrate coastal habitat restoration projects with the boundaries and management of state marine protected areas and Areas of Special Biological Significance.***
- ***3.9.5 Increase interagency participation in management and enforcement of marine protected areas, and continue participation in the Statewide Marine Protected Area Leadership Team.***

*Goal 4: Support Resilient Coastal Communities in the Face of Climate Change and Sea Level Rise*

We would like to thank the Commission for their continued dedication to addressing climate change impacts and for specifically enhancing the sea level rise objectives in this strategic plan. We would like to commend staff for including the support of LCP updates to address other climate impacts such as ocean acidification, increased risk of wildfire and drought and saltwater intrusion, and for including reduction of greenhouse gas emission in LCPs and other efforts. While we strongly support the Commission’s commitment to using the best available science to inform guidance on climate change adaptation strategies, **we recommend that staff include prioritization of natural infrastructure solutions and living shorelines in place of barriers to best protect our coastline. We also encourage the staff to include exploration of managed retreat strategies where possible in the Strategic Plan** as is recommended by the Ocean Protection Council’s California Sea Level Rise Guidance to allow for natural erosion and beach formation to continue in the face of rising seas.<sup>3</sup>

We offer the following language suggestions for these additional actions item under *Objective 4.4 Protect Beaches, Wetlands and Other Coastal Resources, Including Public Access as Seas Rise*:

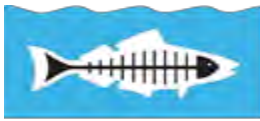
- ***4.4.5 Prioritize wherever possible natural infrastructure and living shorelines as a best management practice when developing sea level rise adaptation strategies.***
- ***4.4.6 Include exploration of managed retreat strategies where possible as a sea level rise adaptation strategy as is recommended by the Ocean Protection Council’s Sea Level Rise Guidance.***

*Goal 5: Advance Diversity, Equity, Environmental Justice, and Tribal Relations*

We would like express deep gratitude to the commission for the inclusion of Goal 5 to advance diversity, equity, environmental justice and tribal relations in the new Strategic Plan. For far too long, coastal access and participation in coastal resource management has been inaccessible to overburdened communities, and the steps this commission has committed to take to address these injustices is imperative. In particular, we would like to commend the Commission for including objectives to increase staff diversity and address institutional racism and unconscious bias through inclusive strategies, awareness building and trainings. We hope that other government bodies in the state of California look to this Commission as an example for how to address environmental injustices in their actions and work plans.

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<sup>3</sup> California Ocean Protection Council Sea Level Rise Guidance Document, 2018, Recommendation Strategies, p. 30



**Heal the Bay**

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This Strategic Plan will not only act as a guidance document for the Commission, but will dictate the decision-making processes that affect major changes along our coastline, from development to access to habitat protection. We thank the Commission and staff for their diligence in drafting this expansive plan, for their consideration of our comments on this document, and for the opportunity to participate in the Strategic Planning process. Please contact Emily Parker at [eparker@healthebay.org](mailto:eparker@healthebay.org) or at 310-451-1500 x156 with any questions or responses to comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Emily Parker', written in a cursive style.

Emily Parker  
Coastal and Marine Scientist  
Heal the Bay

## Comments on the Strategic Plan Update 2020-2025 (the Plan)

From: Leslie Purcell; [lesliepurcell@gmail.com](mailto:lesliepurcell@gmail.com), 2-14-2020.

As a longtime proponent of the Ballona Wetlands, now advocating for a sensitive restoration, not a massive engineering project to let in salt-water in this age of sea-level rise, I remind the Commission of its permanent responsibility for: “Restoration of Wetlands: The Commission must work on and promote wetland restoration (PRC 30231, 30233, and 30411(b) and 30607.1)” <https://www.coastal.ca.gov/perresp.html>

To this end, I appreciate the policy:

“Objective 3.1 Strengthen Implementation of ESHA and Wetland Policies and Advance Habitat Restoration.”

3.1.1 “Develop a coastal habitats compendium that includes habitat characterizations and a summary of related planning and regulatory issues to support review of coastal development permit applications and LCP amendments by local governments and the Commission.”

This could include assessing wetland function, as well as the negative consequences of dewatering, as we have seen in the Ballona wetlands, by the Playa Vista development.

3.1.3 “Collaborate with state, federal and local agency partners to improve understanding and implementation of best practices for avoiding, minimizing and mitigating impacts to sensitive coastal resources in projects and planning efforts.”

Best practices would include restoration of freshwater sources, in the case of the Ballona wetlands. Ballona wetlands overlies and is adjacent to the Playa del Rey Gas Storage field. The Plan could address issues related to oil and gas production in the Coastal zone, and/or effects to Coastal resources.

Air quality impacts in the Coastal zone of release of gases should be considered, both for human residents and visitors, habitats, plants and animals.

3.4.4 “Ensure that oil and gas platform decommissioning occurs consistent with Coastal Act requirements.” Please include **onshore** oil and gas wells, as there are such wells in the Coastal zone in LA and Ventura Counties, and in other counties as well. I urge the Coastal Commission to look into asserting and implementing jurisdiction over the siting of new oil and gas wells in the Coastal zone, as well as decommissioning wells. Continuing oil and gas production is antithetical to the goals of GHG reduction and climate change policies as set forth in this document, and it would be helpful for the Strategic Plan to address Coastal zone impacts from ongoing as well as any new oil and gas wells.

City and County governments are now looking into permitting and policy changes for oil and gas production. I suggest that the Plan include language on coordinating with such governments, particularly in the face of sea-level rise. Existing oil and gas infrastructure should be included, and any new proposed wells and/or infrastructure should be assessed as to potential impacts to Coastal resources, wetlands, tidelands, etc. in the Coastal zone. Language could be added to the following sections in regard to vulnerabilities of oil and gas facilities to sea level rise, as well as an assessment of the contribution of oil and gas production to climate change.

4.1.2 “Engage with relevant providers of key infrastructure assets (such as major energy, utility, and rail companies/agencies) to assess and address infrastructure vulnerabilities to sea level rise and other climate change impacts to inform LCPs and guide decision-making for CDPs.”

4.1.3 “Collaborate with relevant state agencies to better understand vulnerabilities of the state's public infrastructure systems along the coast and develop adaptation priorities that can be integrated into LCPs and/or guide decision-making for CDPs.”

4.1.4 “Work with local governments, stakeholders and the public and through regional climate collaboratives to address regional and local sea level rise vulnerabilities in updates to LCPs”, including oil and gas production-- existing, proposed, or decommissioned.

Oil and gas production may also be detrimental to the Plan’s stated goals in regard to water, ie “Objective 3.8 Avoid and Mitigate Adverse Impacts of Development on Water Quality.”

3.8.1 “Ensure water quality protection policies and practices are included in LCPs and CDPs to protect coastal waters...” could include language re the potential adverse impacts of on-shore as well as off-shore oil and gas production on water quality.

Likewise, oil and gas production, and phasing out and cleaning up infrastructure are relevant to the following section:

3.8.3 “Work closely with the State Water Boards, local governments and other agencies partners to focus attention on improving water quality in California’s Critical Coastal Area (CCA) watersheds, where adjacent high resource-value marine and estuarine areas (including state Marine Protected Areas and Areas of Special Biological Significance) may potentially be threatened or adversely impacted by runoff from land-based development” **(including oil and gas production and facilities)**.

Finally, as a former resident of a cottage at the Topanga Ranch Motel, I encourage efforts to create and maintain lower cost visitor accommodations in the Coastal zone (Objective 2.4), including restoring the cottages at lower Topanga.



**From:** [Rebelle](#)  
**To:** [Coastal Strategic Plan Comments](#)  
**Subject:** No Campground in Marina Dunes  
**Date:** Sunday, February 16, 2020 7:25:09 AM

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What is your job?

Your job is to protect the coast. You are paid to do a job.

I am 100% against the campground project in Marina.

Look at Point Lobos. PEOPLE are destroying it.  
Look at Blg Sur. PEOPLE are destroying it.

We need housing. We are in a housing crisis

This is not a solution. This is GREED!!!!

Do your job and protect the coastline!

Cheryl Robinson.  
831-901-4904

February 14, 2020

Jack Ainsworth  
California Coastal Commission  
Executive Division  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Re: Draft Coastal Commission 2020-2025 Strategic Plan

Dear Mr. Ainsworth:

Thank you for the opportunity to comment on the draft Coastal Commission Strategic Plan. The City of Long Beach appreciates our long-time partnership and collaboration with the Coastal Commission. The City and the Commission share common goals of promoting coastal vitality, recreation, enjoyment and habitat restoration for all. In the interest of that long term partnership we would like offer some frank and direct comments on how to improve the Coastal Commission review of projects and LCP amendments, and it is our hope that these comments will be an important step in improving the City and Coastal Commission's ability to collaborate effectively.

Our comments focus on two focus areas. The first, is the need for the Coastal Commission to improve its level of customer service in processing permits and appeals as well as local government LCPA requests and certifications. The strategic plan should make an explicit commitment to process permit and certification requests in a friendly, collaborative, timely and consistent manner. Beyond the long and unpredictable permit and certification process the City has experienced in recent years, we are also concerned about and want to highlight the difficulty many Long Beach residents, businesses and City project managers experience obtaining routine permits for dock rebuilds, commercial structure remodels and other minor projects.

There are solutions to improve permit review and processing. We currently observe processing times of six months or more, at a minimum, on Long Beach projects. Staffing enhancements may represent a long-term solution to this problem however other tools are also available immediately such as allowing for expedited plan review for an additional fee. The City of Long Beach effectively uses this practice to provide more timely review using existing employees on an overtime basis. In the long term we strongly recommend that the Coastal Commission's fee structure be re-aligned to allow for cost-recovery of a full staff and reduce the number of free or subsidized services.

The Coastal Commission cannot enhance its permitting program without improving the conditions of approval process. Presently, conditions of approval are sometimes received only

days before a hearing and those conditions can be confusing and difficult to implement. As conditions sometimes require substantial modification of the project itself, it is essential, fair and productive to have greater advance notice and collaboration on those conditions. It also would be productive for both applicants and Coastal Commission staff if conditions were more standardized so that implementation does not vary so substantially on otherwise similar projects processed under different permits.

Our second area of concern is better aligning the work of the Coastal Commission with other state agencies, so cities do not receive contradictory instructions and mandates from the Coastal Commission, State Lands Commission, and the Department of Housing and Community Development among others. Whether it is rules for accessory dwelling units or procedures for oil well abandonment, the Coastal Commission can and should better provide guidance and reviews that are consistent with its sister State agencies. We also want to highlight that the current multi-year turnaround times by the Coastal Commission on certification of zoning code changes are wholly inconsistent with mandates cities receive from the Department of Housing and Community Development for timely codes and regulation updates to comply with new housing laws, update Housing Elements and ultimately increase housing production.

The City of Long Beach notes and is proud that we have had several successful partnerships with the Coastal Commission. Our partnership is most successful and effective when Coastal staff share recommendations in advance and are open to input on how best to implement or achieve the Coastal objectives. We encourage more of this type of partnership.

Unfortunately, in recent years, it is also not uncommon for the Coastal Commission's review of zoning ordinances, effectively updates to the local City's LCP Implementation Programs, to broadly exceed its authority supplanting its limited role of reviewing consistency with the Coastal Act with exceptional authority to second-guess local control and governance. The Commission's process should strive to understand and respect local processes by which local elected officials act in the best interest of their communities.

More detailed comments are attached to this correspondence. Should you have any questions regarding this matter please contact Christopher Koontz, Planning Bureau Manager, at (562) 570-6288 or [Christopher.Koontz@longbeach.gov](mailto:Christopher.Koontz@longbeach.gov).

Sincerely,



Thomas B. Modica  
Acting City Manager

TM:LFT:CK:db

Attachments: City of Long Beach 2020—2045 Strategic Plan Comments

cc: Deputy Director Steve Hudson  
Councilmember Roberto Uranga

## CALIFORNIA COASTAL COMMISSION 2020-2025 STRATEGIC PLAN COMMENTS

### **Objective 1.1 (Staffing, Workforce Knowledge/Skills)**

The Strategic Plan should establish a clear pathway to sufficient staffing in order to provide regulated cities and counties, as well as the public at large, with a higher level of customer service and improved permitting process. While 1.1.1 references meeting statutory requirements and meetings the goals of the plan, minimal compliance should not be the aspirational goal. Under current conditions and practices, in the City of Long Beach's experience many permits and LCPA certifications, including for routine zoning code amendments, are subject to a protracted completeness review; a one-year extension, as well as further delays. The Commission's goal should be to maintain staffing sufficient to process items efficiently without extensions and come closer to the practice of cities, where cities are legally required to comply with permit streamlining, housing accountability act and other provisions of law as well as principles of good customer service. Based on Long Beach's recent turnaround times, the Coastal Commission is severely understaffed in its local offices and this results in real, negative impacts to processing permits and LCPA certification requests.

Simply seeking authorization for additional staffing is not a pathway to achieving acceptable staffing levels. The commission should consider increases to its fee-structure in order to provide funding for additional staffing support. Additionally, many services are currently provided to local governments without fee or charge. Cities may consider payment of appropriate fees if responsive services and processing times would improve in return.

### **Objective 1.3 (Standardized Training and Support)**

This objective is important because implementation should focus on providing the training necessary to standardize and improve both the permit review and LCPA certification processes. It is essential that staff receive training regarding successful climate change and land-use planning within the urban context that many district offices work. Cities and counties will be required to make wholesale changes to zoning codes and development processing as part of implementing recent housing legislation and required 6<sup>th</sup> cycle Housing Element updates. It is essential that Coastal Commission staff understand the statutory background behind these changes and that their review is in alignment, and not contradictory to the direction given by the California Department of Housing and Community Development (HCD). Measures 1.3.2 and 1.3.3 both reference partners but it should be noted that those partners include regulated cities and HCD, not just wildlife and resource agency regulators. Additionally, customer service training has been effective at improving the City of Long Beach workforce and we do recommend it for Coastal Commission staff, particularly those processing permit requests from the public.

### **Objective 2.2 (Public Access & Recreational Opportunities)**

The City of Long Beach supports and encourages increased visits, use and enjoyment of the Coastal Zone. It is encouraging to see 2.2.3 in reference to parking reform. Currently the process to approve parking and parking rate changes, how to balance overnight, resident and permit parking with visitor parking needs, implications of wider EV-charging parking stalls, and the balance between transit and parking improvements, are all considered by the Coastal Commission staff on an ad-hoc basis. Providing better guidance and regulations would create a better process for cities as well as the commission to the benefit of the public.

In addition, we note that special events ranging from marathons to concerts to cultural festivals are an important way to bring new visitors to the coast, many of whom return on their own on a future date after the event. The City of Long Beach remains concerned that many conditions imposed on special event Coastal Permits in effect inhibit access by effectively deterring special events from the Coastal Zone. At a minimum, the Commission should apply a more uniform approach to review of special event permits as current some jurisdictions like Long Beach are disadvantaged while others, such as State Parks lands, are advantaged in an unfair manner.

### **Objective 2.3 (Expanding Public Access)**

Increased residential height and density will, in many circumstances, be necessary to support increased public transit and multi-modal opportunities within the Coastal Zone. Coastal Commission policy and practices that inhibit redevelopment of existing shopping centers and under-utilized parcels, complicate reviews of road-diets and other improvements that may result in parking or vehicle capacity in favor of safety and multi-modalism need to be updated in order to achieve this stated objective.

### **Goal 3 (Protecting Coastal Habitat)**

The City agrees with the goal of enhancing actual ESHA and wetlands. Where the City has experienced difficulty is in the uneven, confusing, ad-hoc treatment of urban wildlife that is not endangered and not occurring on ESHA or wetlands. The City has received Coastal Commission staff comments on coast permits related to species of least concern present on street trees and light poles, exotic and non-native species and protection of non-native vegetation. This regulatory overreach is not only inappropriate, but it distracts from the Coastal Commission's core goal and purpose of protecting ESHA and wetland areas. Improved training, consistency and employee oversight is necessary to correct this situation.

### **Objective 3.5 (Reducing Pollution Sources)**

The City has recently phased-out polystyrene products, straws and other waste products in order to protect our environment. The Commission should support similar programs across California jurisdictions and support regional and state regulatory changes to



provide for mandatory reductions in single-use polystyrene and plastic products that find their way to the marine environment regardless of their jurisdiction of origin or sale.

#### **Goal 4 (Resilient Coastal Communities)**

The City shares the goal of increasing resilience and preparation for climate change and sea level rise. We note that the Coastal Commission's approach will be most effective when it is context-sensitive. Dense and built-out communities, such as Long Beach, have limited options and require more physical adaptation to structures than rural or undeveloped areas of the California coast where avoidance and relocation are more viable options.

We also note that the Coastal Commission will be most effective when its rules and regulations are transparent and applied fairly. Recent experiences with the evaluation of sea level rise have been uneven and Long Beach has encountered issues where complex and expensive modeling must be repeated multiple times to satisfy evolving direction from Coastal Commission staff, draft guidelines are used as adopted regulations and permitting and certification decisions are delayed. If the Coastal Commission's goal is to have an effective program and partnerships, all applicants and partners need to be able to understand the review process and treated fairly.

#### **Objective 4.1.4 (Collaboration Updates to LCP to Address SLR)**

This objective refers to working with local governments to address sea level rise through the LCP update process. The City of Long Beach agrees with this approach but is concerned with ad-hoc interpretations of sea level rise risk, policies not contained within our LCP nor Coastal Commission adopted regulations, are being applied to permit reviews and certification requests of minor LCPA IP zoning code amendments. It is also essential that the Commission's authority be used within the confines of its role and structure, that instead of regulatory overreach the Commission give deference and respect to local factors and processes.

#### **Objective 4.2 (SLR Adaptation)**

This objective refers to supporting adaptation including measures 4.2.2 for alignment of different plans. The City of Long Beach recently submitted its AB 691 report to the State Lands Commission, however differing requirements exist from the Coastal Commission for our Climate Action and Adaptation Plan (CAAP) certification. We have obligations to OES that do match our State Lands or Coastal Commission requirements and yet different obligations to FEMA. We applaud the desire to bring these divergent planning mandates into alignment, but it is not clear how that will occur. It has also been our recent experience that the Coastal Commission is assessing a higher risk expectation and lower risk tolerance than other agencies with oversight of Climate Change, resulting in incongruent regulatory environment where cities spend precious funding on overlapping planning exercise rather than the more-important task of implementing those plans and achieving actual Climate Action and Adaptation actions and results.

### **Objective 4.3 (Building Local and CCC Capacity)**

This objective refers to completing coastal adaptation policy guidance and providing training and technical assistance to address climate change and sea level rise. To reiterate, the City supports clear guidance that is reviewed by the public, regulated agencies and then approved by the full Coastal Commission. We remain concerned with the use of draft or evolving “guidelines” being used in permit and certification reviews despite those guidelines never being fully vetted or approved by the Commission nor going through the rulemaking process to transform “guidelines” into binding regulations.

### **Objective 4.5 (Reducing GHG Emissions)**

The City recently adopted a new General Plan Land Use Element that supports smart growth and denser mixed-use development along transit corridors and in downtown areas. We support bringing Coastal Commission guidance, practice and regulation into closer alignment with the direction already given by other state agencies such as Governor’s Office of Planning and Research (OPR), Strategic Growth Council (SGC), Air Resources Board (ARB) and HCD. The final strategic plan should provide greater detail on how this shift in approach will be accomplished and should explicitly seek a greenhouse gas reduction process that is consistent with other state agencies rather than creating new, contrasting regulations for local agencies to then comply with.

### **Goal 6 (Enhancing Permitting)**

The City is pleased to see the permitting and review process addressed in the strategic plan. We believe more explicit language regarding the existing problems with this process and prescribed solutions would improve the potential for truly addressing the problem. The current process for both coastal permits and certification of LCPA IP items is typically slow, marked by repeated and contradicting requests for more information, last minute surprises after long delays and protracted discussions and negotiations with staff.

In the City’s view this process would be more-efficient and effective for all parties if substantive feedback was given early in the design and approval process, if review-period extensions returned to be the exception rather than the rule and if all requests for information were made in the initial 30-day completeness review, as is the spirit of the existing regulations.

### **Objective 6.1 (Improving Local Communication)**

This objective lays out the role of communication between local government and Coastal Commission staff. The City appreciates the monthly meetings and other ongoing communication but is frustrated that this communication, in and of itself, has not improved the permitting and certification process. Due to inadequate staffing as well as possibly procedure or other factors, early consultation rarely provides any binding framework for future permitting and review. Early review comments are often received orally with no written record to refer to in resolving future disputes and the formal review period is marked by serial questions and requests for information up to days before hearings,

rather than front-loading the process as the early consultation meetings are designed to do.

### **Policies 6.1.2 and 6.1.3 (Collaborative LCP Amendments)**

This objective refers specifically to the LCPA process and local planning processes. This part of the process needs dramatic reform. Currently the City provides advance information to Coastal Commission staff regarding zoning code and other LCP IP changes, we do not receive substantive responsive comments. Items are submitted to the Coastal Commission for review. The review period routinely takes more than a year. Promises by Coastal Commission staff to share suggested modifications are sometimes kept and other times City staff reviews those changes by discovering them in Commission staff reports posted online. By the time suggested modifications are available, if anything requires adjustment, discussion or is not acceptable to the City, it becomes the City's burden to postpone the matter and typically wait until the next local area hearing. In some cases, by the time agreement is reached and the Coastal Commission acts, the underlying issue a City Council was trying to address has evolved or the State Legislature has modified the underlying rules (such as No Net Loss, ADUs, Housing Accountability Act, etc.) during the extended Coastal Commission review period. This is not an acceptable process. The Coastal Commission should establish a goal to conduct a more comprehensive overhaul of this process, stronger than the more innocuous "continue to improve" language in the draft strategic plan.

### **Objective 6.2 (Updating LCPs)**

This objective references a goal of updating LCPs. If the Coastal Commission wants to entice cities to update their LCPs they need to provide better alignment of the LCP process and document format with the General Plan process and format established by OPR. Many cities, including Long Beach, have recently undertaken or are currently undertaking updates to their General Plans but are hesitant to undertake a LCP update due to uncertainty as to how the update will be evaluated by the Coastal Commission, what the overall review time would be and the potential for Coastal Commission modifications to conflict with contradictory mandates from OPR, ARB or HCD. Until these issues are addressed, grant funding and other minor improvements will not be sufficient to entice cities to undertake comprehensive updates.

### **Policy 6.3.1 (Timely Processing)**

This objective refers to improving the CDP permit process and application, which the City supports. The language regarding timely application processing is troubling. As currently drafted time processing is only a goal for minor items such as CDP waivers, immaterial amendments, etc. The Coastal Commission should establish a goal of providing excellent customer service and timely processing on all coastal permits, including those for larger or more complex projects. The current issue is not the amount of time spent processing these permits, it is the many, many months that applicants (including cities) wait for their permit request to be processed and the routine practice of Coastal Commission staff to

request additional information as a tool to forestall an application being deemed complete. The permit process should be fair, transparent, consistent and predictable as well as timely and efficient. We respectfully ask that the language be adjusted to reflect this goal.

**Objective 9.5 (Use of technology)**

This objective references an overall E-Government system. The City supports this goal and views that the Coastal Commission should accept and distribute all documents electronically. Even though the Commission's District Office and the City's Civic Center are walking distance, it is not uncommon on any given week for voluminous documents, to be mailed both to and from the City and Commission. While the City appreciates the Commission staff's willingness to transmit courtesy copies of documents electronically and provide notice to City staff regarding incomplete letters, appeals and other matters, the importance of an electronic system (as outlined in 9.5.1) cannot be overstated. The City looks forward to partnering with the Commission to digitize all legacy LCP and permit data and transfer to a fully electronic system going forward.

**From:** Karsten Mueller [<mailto:k.mueller@yahoo.com>]

**Sent:** Friday, March 6, 2020 10:39 AM

**To:** ExecutiveStaff@Coastal

**Cc:** Erica Stanojevic; [Katherine@saveourshores.org](mailto:Katherine@saveourshores.org); Jessie Zupcic

**Subject:** Public Comment on March 2020 Agenda Item Wednesday 7d - California Coastal Commission Public Review Draft Five-Year Strategic Plan (2020-2025)

Dear Commission and Staff,

Please do everything you can to promote Restorative Aquaculture (*Cultivation of seaweed or shellfish that generates positive ecological and social impacts*) as a key component of your Five-Year Strategic Plan. Restorative Aquaculture has the potential to provide habitat, sequester carbon, reduce pressure on wild fisheries with very low inputs all while providing jobs, food and other sustainable products.

In particular please work with other permitting agencies to rapidly create a clear, affordable and timely permitting process for Restorative Aquaculture.

Thank you for considering this important matter.

Sincerely,

Karsten Mueller MS, PhD



**From:** Pfeifer, Sara@Coastal  
**Sent:** Tuesday, March 10, 2020 3:53 PM  
**To:** Jespersen, Michelle@Coastal  
**Subject:** Strategic Plan Comments received by NCC

Attached you will find additional public comment that I received yesterday on the Strategic Plan, for your records. The comment was sent by George Clyde [gclyde11@gmail.com](mailto:gclyde11@gmail.com) of the East Shore Planning Group in Marin.

Comment from George Clyde, East Shore Planning Group:

Every month, to determine the status of Commission permit proceedings and new filings, we find it necessary to query the Commission staff, a time consuming and uncertain process for everyone. This is because there is no on-line public access to even the most basic information about coastal development permit filings and other matters important to the public. Without this process, the only effective notice we have of these matters is when they are agendized for Commission action, complete with a final staff report for which we have had no prior knowledge, much less input.

In 2013, the Commission adopted these provisions in the five-year Strategic Plan to provide greater public access to key information:

- 6.1.5 Create and deploy an online web-interface to support public access to the CDMS.*
- 6.1.6 Make the Commission’s permit and planning records, including final Commission actions and reports available to the public via the Internet.*

Sadly, seven years later, nothing has happened. From the January 2019 Strategic Plan update:

	<b>Objective/ Actions</b>	<b>Need \$?*</b>	<b>Status</b>	<b>Key Outcome or Indicator</b>	<b>Comments/Background/ Outcome Links</b>
6.1.5	Deploy Public web interface for CDMS	\$	<b>In progress</b>	Web Access active	New Public Web Portal is under development. Software updates and required systems upgrades are ongoing. Continued cleanup of historic data ongoing.
6.1.6	Provide CDMS Permit and LCP Data to Public via Internet	\$	<b>In progress</b>	Permit/LCP data available online	New Public Web Portal is under development. Software updates and required systems upgrades are ongoing. Continued cleanup of historic data ongoing. See also 5.2.4.

Worse yet, as the Internet becomes even more essential and transparency is a serious challenge for the Commission and its staff, the concept of a public database is now reduced to a weak single line, without even repeating the plan to make the Commission's permit and planning records, including final Commission actions and reports available to the public via the Internet.

***Objective 9.4 Enhance Functionality of the Coastal Data Management System.***

*9.4.1 Create and deploy an online web-interface to support public access to the CDMS.*

The Commission needs to direct staff to make public Internet access to these public records a high priority, with a short deadline for completion, and to provide the necessary funding.

**From:** "Lovell, Randy@Wildlife" <[Randy.Lovell@wildlife.ca.gov](mailto:Randy.Lovell@wildlife.ca.gov)>

**Date:** March 11, 2020 at 11:02:27 AM PDT

**To:** "Wilson, Mike" <[Mike.Wilson@co.humboldt.ca.us](mailto:Mike.Wilson@co.humboldt.ca.us)>

**Subject:** RE: CDFW/coast act/aquaculture

Sorry for delay, Mike.

I reviewed your Commission's five-yr plan, and noticed that in the context of agriculture, the objective (3.3) is to protect the activity, while aquaculture is not explicitly included within that context. Perhaps it is by reference, according to the definition cited below:

**Aquaculture** is recognized in the Coastal Act – [PRC §30100.2](#) – as **agriculture** for land use planning and permitting, and is a coastal-dependent use, with sites to be protected for that use (PRC [§30222.5](#)). Like many resource agencies, the mandates to both encourage an activity and protect against its impacts must be weighed.

The Aquaculture Development Act ([PRC § 827](#)) calls for the establishment of a policy and program toward improving the science and practice of aquaculture as a means of expanding aquaculture industry and related economic activity in the state. A California marine aquaculture program, or framework, can be broadly conceptualized to include all the policy, management, and regulatory components spread throughout multiple agencies, at all levels of local, State, and federal government, having roles in managing marine aquaculture in the state.

That said, (per [PRC §30411](#)) CDFW and the California Fish and Game Commission are the principal State government entities responsible for the management, protection, and conservation of the state's fish and wildlife resources. As part of that responsibility, the Fish and Game Commission has the authority to regulate certain aspects of commercial marine aquaculture on state lands or in state waters, while CDFW has management responsibility. Specifically, the FGC provides CDFW and the Commission the authority to regulate marine aquaculture in four ways:

- registration of aquaculture facilities and species cultured within the state;
- lease of state water bottoms and water column for the purpose of aquaculture;
- permitting and licensing of various aquaculture-related activities, including stocking, broodstock collection, and importation; and
- detection, control, and eradication of disease in aquaculture facilities.

The specific roles of the Coastal Commission in regulating aquaculture appear to be very broadly interpreted, and have evolved considerably over time. We are looking forward to the interagency dialogue anticipated through the mandate of SB 262 (McGuire) – which added [PRC §30612.5](#) to the Coastal Act – in which the Coastal Commission will work with CDFW and other state agencies relevant to coastal permitting and stakeholders to develop guidance for applicants for coastal development permits for shellfish, seaweed, and other low-trophic mariculture production and restoration. In concert with Objective 3.4.2, this effort may be best accomplished through the Aquaculture Development Committee and an anticipated public discussion convened by the Fish & Game Commission to refine the management framework for marine aquaculture development in California. The beginning of that latter effort will start at the Marine Resources Committee meeting next week (Mar 17) in Santa Rosa. I would encourage Commission staff's participation in the ADC's and F&G Commission's activities, and welcome the opportunity to clarify the respective responsibilities of our agencies and the directives to permittees I must provide as the State Aquaculture Coordinator (see duties in FGC [§15100](#)) with regard to marine aquaculture activities.

I hope this helps. Please let me know how I can further help.

Randy.

RANDY LOVELL  
STATE AQUACULTURE COORDINATOR  
CA DEPT FISH & WILDLIFE  
SACRAMENTO CA

**PLEASE NOTE: TELEPHONE CHANGE (DEC2019)**

**916-376-1650**

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