

CALIFORNIA COASTAL COMMISSION

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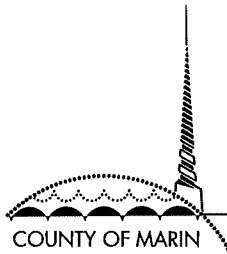


W6d

Joint Statement on Adaptation Planning

November 3, 2020

CORRESPONDENCE



COMMUNITY DEVELOPMENT AGENCY
PLANNING DIVISION

Thomas Lai
ASSISTANT DIRECTOR

October 30, 2020

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Hon. Chair and Members
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

**RE: Shared Principles for Adaptation Planning
Item W6d**

Honorable Members of the Commission,

Thank you for the opportunity to comment on your consideration of the Shared Principles for Sea Level Rise Adaptation Planning prepared by the Commission's Local Government Working Group.

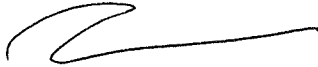
As you know, the County of Marin and its coastal communities have been working for years on completing our Local Coastal Program update, and in particular, the policies and implementation measures related to environmental hazards and the unprecedented threats of sea level rise. In addition, the County has recently initiated a number of innovative sea level rise adaptation planning projects for specific areas of Marin's coast. Accordingly, we have reviewed the Shared Principles with great interest and are very appreciative and supportive of efforts by the Local Government Working Group to develop strategies to improve collaboration and communications between local governments and the Commission on these important programs.

In particular, we are pleased to see that the Working Group has recognized the critical importance of planning for sea level rise adaptation in a way that responds to unique local community contexts, supports creative and flexible solutions, allows a phased approach based on thresholds rather than specific timelines, strives for predictable and efficient permitting procedures, and recognizes the value of incremental near-term progress as a foundation for longer-term outcomes, or as stated in the document, "progress over perfection". We also strongly support the development of guidance that recognizes that coastal armoring may be appropriate in certain limited situations or timeframes when properly mitigated either locally or at a regional level.

In conclusion, we believe the principles outlined in the Joint Statement will greatly facilitate efforts to collaborate with local communities and the Commission on development of effective, responsive and feasible sea level rise adaptation policies and provisions and urge your Commission to adopt the Joint Statement of Principles for Sea Level Rise Adaptation Planning.

We look forward to continuing our work with the Commission and your staff on the completion of our LCP Update and continued adaptation planning efforts throughout Marin's coastal zone.

Sincerely,



Thomas Lai,
Assistant Director

cc: Supervisor and Coastal Commissioner Katie Rice
Supervisor Dennis Rodoni
Supervisor Damon Connolly
Supervisor Kathrin Sears
Supervisor Judy Arnold

Alliance of Coastal Marin Villages

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

Via Email

Item W6d

October 30, 2020

California Coastal Commission
455 Market Street
Suite 300
San Francisco, CA 94105

Re: Comments in Support of the Shared Principles for Adaptation Planning,
Comments Against Last-Minute Posting of Joint Statement For Adaptation Planning.

Dear California Coastal Commissioners:

The Alliance of Coastal Marin Villages (“ACMV”) represents 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 meets regularly to discuss and address issues of common concern and on a quarterly basis with Marin County Supervisor Dennis Rodoni. The ACMV also endeavors to closely follow Marin County and California Coastal Commission (“CCC”) actions that have the potential to impact our communities, including but not limited to updates to the Marin County Local Coastal Program (“LCP”), the governing land use document for our communities.

We write today in support of the proposed Shared Principles for Adaptation Planning that until sometime in the last 24-48 hours was posted as Item W6d on the Commission’s November 4, 2020 meeting agenda (“Shared Principles”) and ***we urge the Commission to adopt the Shared Principles as originally posted.*** The Shared Principles were drafted by a Local Government Working Group comprised of representatives of the California State Association of Counties (“CSAC”), the League of California Cities and a CCC subcommittee consisting of Commissioners Groom and Wilson with the acknowledged and commendable goal of developing strategies to improve collaboration and communication between local governments and the Commission on sea level rise adaptation planning and LCP updates. As this Commission is well aware from prior comment letters the ACMV has submitted on a variety of issues, the ACMV whole-heartedly shares this goal and is deeply appreciative of Commissioners Groom and Wilson’s recognition of the need for improvement in this area.


The Shared Principles represent a welcome return to the core principles of the Coastal Act, which is grounded on the principles of partnership between the State and local governments and the robust engagement of all stakeholders and the general public on policy issues affecting the California coast. Indeed, the Coastal Act expressly recognizes and prioritizes *local* sovereignty over the content of Local Coastal Programs (*Coastal Act Section 30512.2(a)*), subject to consistency with that Act. The ACMV respectfully submits that it is *only* with a shared set of principles between local governments and the State (as represented by the Commission) –principles that include creativity, flexibility, and consideration of unique local community contexts -- that meaningful progress on effective sea level rise adaptation and much-needed LCP updates will be accomplished.

Letter to the California Coastal Commission
October 30, 2020
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In this spirit, we commend the comment letter submitted by Tom Lai, Assistant Director, Marin County Community Development Agency in favor of the Shared Principles and we concur with his assessment that adoption of these principles by the Commission will greatly facilitate collaborative efforts between local governments and the Commission to confront the challenges we collectively face on the California coastline. The input of *all* stakeholders, including but not limited to local governments and affected communities, must be considered and balanced in order for proposed solutions to be accepted and implemented. Thank you very much for this opportunity to comment on the Shared Principles.

We add this closing paragraph to our letter, which was intended to be submitted as drafted above, upon learning today that this agenda item was substantively changed in the last 24-48 hours to re-title the Shared Principles as a Joint Statement on Adaptation Planning and to meaningfully revise the final two paragraphs of the Shared Principles by eliminating all language pertaining to the principle that armoring may be a viable near-term adaptation strategy in some locations. The ACMV objects strongly to these eleventh-hour revisions to the Shared Principles and formally requests an answer from the Commission as to whether all of the Local Government Working Group members agreed to these revisions. Thank you very much.

Very truly yours,



Jennifer Blackman
Chair, Alliance of Coastal Marin Villages

cc: Steve Padilla, Chair, California Coastal Commission, Stephen.Padilla@coastal.ca.gov
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