



November 16, 2021

The Honorable Steve Padilla Members of the California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

RE: Item 7d, California Coastal Commission Meeting of December 15, 2021 - Local Government Working Group
Sea Level Rise Adaptation and LCP Update Documents

Dear Honorable Chair Padilla and members of the California Coastal Commission:

We are Smart Coast California (SCCa), a nonprofit organization dedicated to advocating for the collaborative stewardship of the coast, community sustainability, property rights and the environment. Our statewide membership of over 90,000 acknowledges the imperative planning effort underway and appreciate the opportunity to provide comment on several this guidance document.

SCCa would like to express **support** for the following guidance document recommendations:

From the Framework for a Phased Approach to Updating LCPs for Sea Level Rise.

- SCCa supports the guideline that LCPs be able to flexibly address “unique local issues” (page 3).
- SCCa supports Appendix A’s inclusion of model policies (such as Morro Bay’s PS-3.4) that incorporate a Tiered Response strategy by triggering adaptation responses based on sea level rise thresholds.
- SCCa supports the suggested baseline policy of Phased Adaptation. Using observable sea level rise thresholds to trigger an LCP update aligns with a smart Tiered Response strategy that responds to actual, not just predicted, change.

SCCa supports the Joint Statement on Regional Approaches to SLR Adaptation Planning, which calls for regional solutions to regional problems that extend beyond jurisdictional boundaries. SCCa particularly highlights the potential for artificial reefs as a regionwide tool to protect against shoreline and bluff erosion.

SCCa supports the Coordination and Elevation Process for LCP Updates, particularly in resolving delays due to protracted policy disagreements between local government staff and Commission staff.

- SCCa would like to see a path forward for local agencies to take their adopted plans to the Coastal Commission to be heard, as opposed to being withdrawn prior to the certification hearing. Multiple jurisdictions have made significant investments of both time and resources and have facilitated extensive stakeholder involvement. Months of delay due to disagreement with Coastal Commission staff is not only impractical but could be seen as a misuse of public funds as these studies must be current to be effective planning tools.
- SCCa would also like to reiterate that, in resolving disputes between local governments and the Coastal Commission, local governments must retain the power to design their own adaptation strategies consistent with Coastal Act section 30500(c):
 - *The precise content of each local coastal program shall be determined by the local government, consistent with Section 30501, in full consultation with the commission and with full public participation.*


SCCa would like to express **concern** with the following guidance document recommendations:

Framework suggested baseline policy Best Available Science

- SCCa supports Best Available Science as an excellent goal. However, we are concerned that the Coastal Commission has chosen to utilize the data with a .5% probability of occurring and is attempting to apply measures to respond to the Medium High Risk Aversion scenario, in many cases for year 2100 and beyond, now. The use of this data set translates to promoting managed retreat as a one size fits all response. Managed Retreat cannot be applied in all coastal areas of California. Each jurisdiction should have the prerogative to choose their own tiered response thresholds, which include both community and individual responses to protecting both public beaches and private property from sea level rise.

In conclusion, with the combined efforts of the CCC and local governments, and the support of organizations like SCCa, we can create a framework for Local Coastal Plan Amendments to prepare us for Sea Level Rise, protecting both our cherished communities and precious environment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joe Prian', with a long horizontal stroke extending to the right.

Joe Prian
President

Smart Coast California