

CALIFORNIA COASTAL COMMISSION

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F10e

Prepared October 12, 2022 for October 14, 2022 Hearing

To: Commissioners and Interested Persons
From: Dan Carl, Central Coast District Director
Tristen Thahalbuber, Coastal Planner
Subject: **Additional hearing materials for F10e**
LCP Amendment Number LCP-3-SCO-20-0066-2 (Coastal Hazards Update)

This package includes additional materials related to the above-referenced hearing item as follows:

Additional correspondence received in the time since the staff report was distributed



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COASTAL COMMISSION
CENTRAL COAST AREA

Agenda Item F10e

Environmental Action Committee of West Marin

October 7, 2022

Chair Donne Brownsey
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105
Via Electronic Delivery: CentralCoast@coastal.ca.gov

Re: Public Comment on October 2022 Agenda Item Friday 10e - Santa Cruz County LCP Amendment Number LCP-3-SCO-20-0066-2 (Coastal Hazards Update)

Dear Chair Brownsey,

The Environmental Action Committee of West Marin (EAC) submits the following comments regarding Santa Cruz County's proposed Local Coastal Program (proposed LCP) update related to coastal hazards. We are primarily a locally focused organization, and we do not normally comment on LCPs outside of our region. However, we do engage in statewide sea level rise and coastal adaptation planning efforts, which impact our local area. Unfortunately, this proposed LCP update raises serious concerns related to setting a negative statewide precedent, which would impact Marin County's pending coastal hazards LCP update. Marin County, like Santa Cruz County, is a popular Bay Area recreation destination, as well as a geographically diverse area.

We are writing today to express concern related to Santa Cruz County's proposed LCP update and to support the staff recommendation to deny the amendment. The proposed LCP amendment is inconsistent with the Coastal Act and would set a negative precedent for other LCP updates. The Santa Cruz LCP update proposes to allow seawalls for new development as well as extending shoreline armoring, which is not only inconsistent with the Coastal Act but could also have unintended consequences. As page 3 of the staff report states, the "Coastal Act generally prohibits shoreline armoring except to protect pre-Coastal Act structures or coastal-dependent uses." This allowance for shoreline armoring is much narrower than what the proposed LCP suggests.

We agree with the staff report that states, "the proposed amendment does not adequately protect coastal resources and cannot be found consistent with the Coastal Act for several key reasons." (Page 2). The staff report emphasizes that Santa Cruz County is relying too heavily on coastline armoring in response to sea level rise. Proposing armoring of new development stands in contrast to California Public Resources Code Section 30253, which states that new development "shall" not require a shoreline protection device.

It is well-established that the use of seawalls leads to beach loss and thus loss of public access. Everyone should be able to access California's beautiful beaches and coastline, not just adjacent property owners. Shoreline armoring does not only erode beaches; it also impacts public tidelands, nearshore habitats, and impacts waves. The area in question happens to be a popular local recreation and surfing area, utilized by locals and visitors alike.

We also agree with the staff's concerns related to the difficulty of implementing an overly complex LCP. Unfortunately, there is often turnover at county offices, and an overly complex and inconsistent LCP is not likely to be consistently or equitably implemented.

While we understand the complexity of the issues, we respectfully request that you deny this proposed LCP update, consistent with the staff recommendation. We must preserve the sanctity of the Coastal Act and coastal access for all, rather than creating a dangerous precedent for other LCP updates, which already face challenges as we all grapple with climate adaptation. Thank you for your consideration of our comments and your dedication to the protection of coastal resources and public access for all.

Sincerely,



Morgan Patton
Executive Director



Ashley Eagle-Gibbs, Esq.
Legal and Policy Director

cc: Jack Ainsworth, Executive Director, California Coastal Commission
Ryan Moroney, District Supervisor, California Coastal Commission
Rainey Graeven, District Supervisor, California Coastal Commission