

CALIFORNIA COASTAL COMMISSION

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F4

Local Government Workshop

August 12, 2022

CORRESPONDENCE



August 8, 2022

Honorable Chair Brownsey
California Coastal Commission
Via electronic submission

Dear Chair Brownsey:

Thank you for the opportunity to submit this comment on behalf of Smart Coast California, regarding August 12, 2022, Coastal Commission meeting Agenda Item 4, Local Government Workshop. Smart Coast California (SCCa) is a 501(c)(6) organization established in 2019 to promote and advocate for property rights and smart land-use policies affecting California's coastline.

We are sharing with you a video recording of four elected officials speaking on how the LCP Amendment process unfolded, or continues, in their local jurisdictions. The recording is from the first panel, titled Coastal Plans on the Local Level, of the Sea Level Rise Policy Summit hosted by SCCa in Long Beach in May of this year.

Panel Link: [SCCa Summit Coastal Plans on the Local Level\(1\).mp4](#)

The panelists represent a range of community conditions and LCP Amendment experiences. **Mayor John Headding of Morro Bay** speaks on the successfully certified LCP Amendment and the balance of retreat/protection as local conditions warrant. **Councilmember Terry Gaasterland of Del Mar** and **Supervisor Das Williams of Santa Barbara County** explain the unresolved policy disagreements between their staff/constituents and Coastal Commission Staff, the motivations for withdrawing their LCP Amendments prior to Coastal Commission certification hearings, and how they hope collaboration with the Coastal Commission will soon result in a certified LCPA. Lastly, **Supervisor Manu Koenig of Santa Cruz County** details the ongoing work and interactions with the Coastal Commission on the county's coastal hazards LCP Amendment, focusing especially on the benefits of the proposed Shoreline Protection Exception Area policy as a balanced solution within challenging local conditions. A question-and-answer period follows the four presentations that dives into greater detail on select issues and takeaway points.

We request your consideration of this video comment, as the content each elected official shares illuminates the LCP Amendment process from the perspective of those grappling with unique local conditions and provides meaningful insight into how collaboration with the Coastal Commission has been received and can be improved. This video comment is essentially

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feedback for the Coastal Commission and Local Government SLR Working Group that can lead to better local outcomes throughout the state.

Additionally, attached to this letter are important considerations for the Coastal Commission and Local Government Workgroup. SCCa respectfully requests consideration of these items, in addition to the content provided by the panel discussion video.

Thank you again for your time and consideration of our comments and the comments of the four local officials sharing their thoughts and hopes for improved coastal planning. We look forward to continuing our communications with the Local Government Workshop participants.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Prian".

Joe Prian
President
Smart Coast California

Cc: Honorable California Coastal Commissioners
Local Government Workshop Participants

ATTACHMENT A

Smart Coast California (SCCa): Submitted August 8, 2022

SCCa respectfully urges consideration of the following points:

Document A: 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”¹ and encourages the Coastal Commission to respect the unique local solutions that local governments propose after much time and effort. Local governments are best equipped to craft updated LCP policies and adaptation projects that address the unique challenges of their local conditions. SCCa emphasizes that the Coastal Act requires deference to local governments as discussed above, emphasis added:
 - 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 supports the suggested baseline policy of Phased Adaptation. Using observable sea level rise thresholds to trigger an LCP update aligns with a sensible Tiered Response strategy that responds to actual, not just predicted, change. The inclusion within Appendix A’s model policies of Morro Bay’s PS-3.4 provides a useful example of how local governments can trigger adaptation policies based on observable sea level rise thresholds.²

Document B: Joint Statement on Regional Approaches to SLR Adaptation Planning

- SCCa supports the call for regional solutions to regional problems that extend beyond jurisdictional boundaries. SCCa particularly emphasizes the potential for artificial reefs or partially submerged living breakwaters as a regionwide tool to protect against shoreline and bluff erosion while producing significant co-benefits of ecological and recreational value. Artificial reefs were highlighted as a preferred nature-based adaptation strategy in the Coastal Commission’s recently published Draft Public Trust Guiding Principles and Action Plan.³
- SCCa urges the Coastal Commission to facilitate these regional solutions by improving its timely and effective collaboration with local jurisdictions. Local governments need the Commission to allow adaptation projects to move forward and not become stalled in the Commission’s review and comment process due to a lack of consensus. As previously cited, the Coastal Act requires deference to local governments respecting local adaptation projects and policy.
- SCCa understands that staffing capacity issues often limit the Commission from reviewing, commenting on, and ultimately approving adaptation projects and LCP Amendments as thoroughly and quickly as desired. Giving reasonable deference to local governments’ well-studied and thoroughly planned proposals may enable the Commission to more productively support the efficient response to sea level rise at the local level.

Document C: Elevation and Concurrence Process to Support Efficient LCP Updates

¹ Local Government Working Group, *Sea Level Rise Working Group: 2021 Work Products*, “Framework for a Phased Approach to Updating LCPs for Sea Level Rise,” December 3, 2021, pg. 3.

² Local Government Working Group, *Sea Level Rise Working Group: 2021 Work Products*, “Framework for a Phased Approach to Updating LCPs for Sea Level Rise,” December 3, 2021, pg. 15.

³ California Coastal Commission, *Draft Public Trust Guiding Principles and Action Plan (June 2022)*, May 26, 2022, pg. 17.

ATTACHMENT A

Smart Coast California (SCCa): Submitted August 8, 2022

- SCCa supports the goal to resolve LCP update delays due to protracted policy disagreements between local government and Commission staff, especially as three jurisdictions have withdrawn their LCP Amendments from Coastal Commission certification in the past two years (San Clemente [resolved and moving forward], Del Mar, and Santa Barbara County).
- 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, only to withdraw or stall their LCP Amendment due to unresolved policy disagreements with Coastal Commission staff. Months of delay is not only impractical, but it may also be viewed as a misuse of public funds as these studies must be current to be effective planning tools.
- During SCCa's inaugural Sea Level Rise Policy Summit in May, 2022, Santa Barbara County Supervisor Das Williams spoke on the issues the county faced throughout its collaboration with Coastal Commission staff, which ultimately led to the County's withdrawal of its LCP Amendment prior to certification. He concluded by explaining that LCP updates do not occur in a vacuum—they are one of many climate-change adaptation initiatives that are critical for local governments, not to mention numerous other policy priorities that need to be addressed. When local governments throughout the state witness the protracted LCP update processes of Santa Barbara County, Del Mar, and San Clemente, or the ongoing delays experienced by Santa Cruz City and County as well as Marin County, due to disagreements from Coastal Commission staff, it disincentivizes those other local governments from initiating important LCP Amendments. They cannot afford to spend years of time, staff effort, and public money on intractable disagreements with the Coastal Commission when there are a host of other policy priorities that they can accomplish in a more timely fashion.
- A final very important consequence of planning efforts becoming stalled at the Coastal Commission is a lack of pilot projects being implemented. Oceanside's Beach Sand Replenishment and Retention Device Study is a significant example. This project includes beach nourishment, sand retention groins, and artificial reef/submerged breakwater strategies for shoreline protection and was approved by the City Council in August 2021. It is crucial that California progresses beyond the study and planning phases and actually implements adaptation projects. Efficient support and approval of projects such as Oceanside's will encourage other jurisdictions to quickly follow suit, saving huge costs by proactively planning. There is no time to waste in applying effective solutions, but this cannot happen without responsive collaboration and approval/certification from the Coastal Commission.



CITY OF NEWPORT BEACH

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Mayor

Kevin Muldoon

Mayor Pro Tem

Noah Blom

Council Members

Brad Avery

Joy Brenner

Diane Brooks Dixon

Marshall "Duffy" Duffield

Will O'Neill

August 9, 2022

California Coastal Commission
South Coast District Office
301 E. Ocean Boulevard, Suite 300
Long Beach, CA 90802-4830
statewideplanning@coastal.ca.gov

RE: Comments on Local Government Workshop - Sea Level Rise Adaptation
Workshop and Local Coastal Program (LCP) Updates

Dear Commissioners,

The City of Newport Beach appreciates the work effort, collaboration, and thoughtfulness of the California Coastal Commission's Local Government Working Group. With over 63 percent of the City located within the coastal zone, including 2.5 square miles of bay and harbor waters and over 30 miles of bay and waterfront, adapting to sea level rise (SLR) is an important component of the City's planning efforts for long-term resiliency. While the Working Group documents are a step in the right direction and we appreciate the commitment to improved coordination, the City respectfully requests that the California Coastal Commission prioritize the protection of property rights as part of the conversation to ensure successful collaboration.

The City's Local Coastal Program (LCP) Implementation Plan was certified by the California Coastal Commission in 2017 and already includes several of the

recommended baseline policies. These policies include use of best available science, requirements to address site-specific coastal hazards (including SLR), and risk disclosure/assumption of risk. The City is in the process of embarking on a comprehensive SLR Vulnerability Analysis and Adaptation Plan as part of the General Plan Safety Element Update in 2023. While the City is committed to shoreline management and preservation of public access, the notion of mandatory managed retreat, even as phased policy, remains of significant concern. As evidenced by the recent efforts from the City of Del Mar and County of Santa Barbara, the California Coastal Commission's push to incorporate managed retreat into LCPAs will remain a constant point of contention that will not be resolved by enhanced coordination or elevation of disagreements. We believe a more balanced approach that prioritizes the protection of property rights will foster successful collaborative efforts resulting in policies that protect the public while maintaining public access.

Please consider the general comments below on the following referenced Working Group and California Coastal Commission products:

- Draft Public Trust Guiding Principles and Action Plan (June 2022)
- Local Government Working Group's 2021 Work Products (December 3, 2021)
- Documents Developed to Support Improved SLR Adaptation and LCP Update Processes

Future regulatory takings and managed retreat. The City is supportive of the working group's efforts and spirit of compromise to improve the LCP Amendment process, yet recent draft policy documents such as the *Draft Public Trust and Guiding Principles and Action Plan (June 2022)* seem to thoroughly lay the groundwork for implementing managed retreat and a regulatory taking of private lands. From a policy perspective, the focus should be on avoiding "unmanaged retreat" and identifying incremental, phased approaches for specific geographies rather than setting up a framework for systematically taking private property without considering State compensation.

Shoreline Protection and "existing development". The City of Newport Beach is a unique City with a large harbor and an existing system of bulkheads and other shoreline stabilization structures. The maintenance and enhancement of this existing system of shoreline protective devices must be continuously allowed. Attempts to redefine the term, "existing development" to be only development that predates the Coastal Act potentially threatens vast areas of the City and the

California coast. Guiding Principal Number 8 of the *Draft Public Trust Guiding Principles and Action Plan (June 2022)* acknowledges that, “In some cases, protective devices serve public uses that are consistent with the Coastal Act and the public trust, such as bulkheads in ports and harbors that increase opportunities for fishing, boating, water-dependent commerce, and public access.” The City agrees with this statement; however, the statement does not acknowledge the need to protect existing development that includes residential and commercial development and the infrastructure that supports it. The document goes on to say, “Shoreline armoring built to protect private property that does not serve the public trust or provide statewide benefits, however, will not generally have corresponding public benefits, and a large-scale loss of coastal habitat and public recreational spaces to shield private property would not adequately protect public trust resources and uses,” which is an astounding statement. Private development in the Coastal Zone, including the billions of dollars of investment in the City of Newport Beach alone, certainly provides significant statewide benefits in the form of taxes. These funds support the provision of recreational access, public access, and environmental stewardship the City is famous for. Newport Harbor and the miles of open public beaches cannot be supported without existing private development in and around these resources. Individual shoreline protective devices, whether on public or private land, are part of an indispensable and larger interconnected system of flood protection. Stating that shoreline protective devices are “generally inconsistent with Coastal Act requirements and with the protection of public trust resources and uses” is a distortion of the fact that shoreline protective devices shall be allowed to protect existing development.

Natural Shoreline Protection. Natural techniques such as wetland restoration, dune restoration, and sand replenishment may only be an appropriate and viable solution for public improvements in certain limited areas (such as existing natural habitat areas). The City presently utilizes this strategy along the Balboa Peninsula, certain inner Harbor areas, and the beaches of Corona del Mar to protect public access (i.e. beaches, walkways, etc.), existing private development, and existing public infrastructure. The City will continue to rely upon sand replenishment and dune restoration going forward as it is a critical component of the City’s SLR strategy. The result will be an enhanced and protected community. The document seems to limit which natural techniques should be used, and the City encourages revisions to acknowledge a broader application of natural shoreline protection.

One-size-fits-all approach. The City supports a phased approach with a set of established triggers based on the “best available science”, however, these triggers should be established at the local level. Additionally, local jurisdictions should be

allowed to use different levels of probabilistic projections for sea level rise for decision making and should not be required to implement a universal state mandate. A localized approach is more appropriate and would allow for individual community needs. In other words, a local jurisdiction must be allowed to determine its own levels of risk and how best to adapt. A one-size-fits-all, top-down State mandate approach does not foster collaboration and is simply counterproductive. The City appreciates the Working Group's suggestion on Page 7 of the *Local Government Working Group's 2021 Work Products (December 3, 2021)* document to provide a simple elevation trigger process as a mechanism for periodic check-ins, to coordinate on difficult issues, and to elevate challenges or questions as they arise.

Adopting Localized Probabilistic Risk Projections. Allowing for cost-benefit analysis in consideration of probabilistic projection policies is appropriate for local jurisdictions to consider strategic land use decisions. Local jurisdictions must have the flexibility to adopt different levels of risk (i.e. probabilistic projections) in planning for sea level rise. Cities that can afford to repair or replace occasional damage should have the flexibility to adopt policies that allow for taking higher risks. The Commission should consider adding specific policy language to allow more local control.

It is imperative to adapt to sea level rise policies fostering a more balanced and realistic approach as described in this letter that will foster more coordination and cooperation between the Coastal Commission and the people they serve. Thank you for providing the opportunity to share these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Muldoon', with a large, sweeping flourish extending to the right.

Kevin Muldoon
Mayor, City Newport Beach

Cc: Newport Beach City Council Members
Grace Leung, City Manager
Seimone Jurjis, Community Development Director
League of California Cities (via email: cityletters@cacities.org)

From: [Jo Drummond](#)
To: [Coastal Statewide Planning](#)
Cc: [SouthCentralCoast@Coastal](#); [Bruce Silverstein](#); [Bill Sampson](#); [Sam Kaplan](#); [Georgia Goldfarb](#); [Jae Flo](#); [K Hill](#); [John Mazza](#); [Andrew Ferguson](#); [Trevor Neilson](#); [Evelin Weber](#); [Rosemarie Inde](#); [ryanmalibu@msn.com](#); [Patt Healy](#); [Scott Diltrich](#); [Paul Taublieb](#); [Frank Angel](#); [DeeDee Graves](#); [Colin Drummond](#)
Subject: Sea Level Rise Workshop Friday, August 12 public comment
Date: Friday, August 5, 2022 5:58:12 AM

Attn: Coastal Commission:

As per my past emails below to our local Malibu city council the LCP should be changed to no longer allow beachfront development that can cause any beach erosion and be affected by sea level rise due to their wall of concrete necessary to build and no current limit on home sizes on the beach which is ridiculous. How did a four lot home on Millionaires beach be approved that will just shorten the life span of a beach already scheduled without any mitigation to be completely eroded in the next 20-40 years?

To avoid a managed retreat we need to stop building on the beach and start protecting the existing shoreline with natural protective devices such as a vertical groin, dune restoration and/or natural breakwater coral reefs. We also need the systematic over time removal of the Rindge dam to replenish surfrider beach and beyond.

We know that sea rise and beach erosion is happening so why would we implement Site-Specific Shoreline Hazards Evaluations when we already know we cannot continue to build on the beach? Doing anything less than restricting building would be essentially putting our heads in the sand waiting for the impending repercussions which is irresponsible.

As in the City of Morro Bay Land Use plan: We should establish a program to amend the Municipal Code to require sellers of real estate to inform owners of real estate in these areas of permit conditions related to coastal hazards or property vulnerabilities, including information about known current and potential future vulnerabilities to sea level rise, and disclosing permit conditions related to coastal hazards to prospective buyers prior to closing escrow. And Development Standards - In these areas revising residential building standards to prohibit habitable space at elevations subject to wave/flood risk. Specifically addressing potential impacts of basements on long-range adaptation options such as landward relocation or removal. Transfer of Development Rights (TDR) - Considering a TDR program to restrict development in areas that are vulnerable to sea level rise and allow the transfer of development rights to parcels with less vulnerability to hazards.

Please change our local coastal program to no longer be able to create oversized buildings on the beach and ensure protective measures are put in place to restore our diminishing beaches.

Thank you,

Jo Drummond

From: Jo Drummond <jyotidrummond@yahoo.com>

Subject: Re: SLR Malibú

Thanks for the quick response Mayor Paul!

I can try and find someone at Coastal and ask. But from the first page of this chapter from the California Coastal Commission it states their position that 'coastal erosion and accretion has been shaping our coast for many thousands of years' and 'coastal erosion is natural, but things people do alter it. People build seawalls to protect buildings built close to the ocean. Human barriers to erosion, such as seawalls and retaining walls, can protect what is behind (landward of) them, but do nothing to protect the beach. As waves interact with these structures, erosion may increase up and down the beach....We can increase erosion with the increased (sediment free) runoff caused by developing the coast.' https://www.coastal.ca.gov/publiced/waves/waves_6.pdf

Seawalls, etc. block the natural runoff by trapping sediment under the hardened surfaces so it no longer flows into the ocean to replenish the beaches. (see bottom of this publication - <https://explorebeaches.msi.ucsb.edu/sandy-beach-life/sand-movement>)

I remember when Point Mugu was blocked for 3 months from a few mudslides in 2015. Maybe it would have been a better idea to dump the dirt onto the beach but it could have been full of rocks or vegetation? I'm sure the geologists were on it. In 2018 sediment cleared from roads and channels in Montecito after the Thomas fire mudslides were transported to local beaches at Carpinteria and Goleta and they made sure it did not contain debris, rocks or vegetation. The Coastal Commission approved this emergency permit so hopefully they have changed their original policy.

I do like a natural vertical groin idea or possibly better a natural breakwater (constructed reef, etc) so that one part of

the beach is not negatively affected (Santa Monica). Perhaps that can be put into the Malibu Shoreline Project?

I've also read that the eventual removal of the Rindge Dam (that has trapped over 800000 cu yards of sediment) will help nourish our beaches and recover several endangered species such as southern steelhead trout. The plan is to return at least 1/3 of that sediment to the nearby Malibu shoreline and the sediment free water from the dam that is quickly running down and eroding the beaches will be no more. This is also approved by the Coastal Commission. [Rindge Dam | California Trout](#)

Thanks so much for staying on top of this! Jo

On Tuesday, September 28, 2021, 10:38:06 AM PDT, Paul Grisanti <pgrisanti@malibucity.org> wrote:

Hi Jo,

Please use whatever connections you have to the Coastal Commission to ask them if they see any connection between their policy preventing any runoff of eroded materials from reaching the ocean and the fact that the sand is not being replenished.

Sand is soil after the organic components have been washed out.

Over the lifetime of a grain of sand it washes continuously against other grains of sand steadily reducing its size until it becomes light enough to be carried out to sea.

You may remember that about 5 feet of soil covered Pacific Coast Highway just past Neptune's Net in 2016 for over ½ a mile. Rather than shoving it over the side to fulfill its destiny as sand, Coastal policies required that it be trucked to landfills. We got lots of Truck pollution but not a grain of sand.

Over the last 43 years I have seen the sand in Santa Monica and the distance between those houses and the water triple and quadruple as littoral flow brings Malibu sand to Santa Monica.

When I arrived in Malibu in 1978 there were still vertical groins along Tuna and Big Rock beaches that had been installed in the 1920 to catch and retain the sand from the Littoral west to east flow. The last vestiges of the groins were removed in the late 80's and the sand moved down to Santa Monica

All the best,

Paul Grisanti

Mayor

310-505-5006

From: Jo Drummond <jyotidrummond@yahoo.com>
Sent: Monday, September 27, 2021 11:12 PM
To: Karen Farrer <kfarrer@malibucity.org>; Paul Grisanti <pgrisanti@malibucity.org>; Bruce Silverstein <bsilverstein@malibucity.org>; Mikke Pierson <mperson@malibucity.org>; Steve Uhring <suhring@malibucity.org>; Steve McClary <SMcClary@malibucity.org>
Cc: Colin Drummond <colindrummond@gmail.com>; Rosemarie Ihde <rosemarie.ihde@gmail.com>; Georgia Goldfarb <Georgia.Goldfarb@healthequality.net>; Patt Healy <healypatt@aol.com>; Lyuba Chumak <lyubow555@yahoo.com>; James Sarantinos <sarantinos@aol.com>; Kraig Hill <kraig.malibu@gmail.com>; John Mazza <Res02igz@gte.net>; Jeff Grier <grierj@live.com>; malibublondes@aol.com; Walter A. Zelman <wzelman@calstatela.edu>
Subject: Re: SLR Malibú

Honorable Mayor Grisanti, City Council & City Manager Steve McClary,

This wasn't addressed by the council after my public comment tonight so just sending to you all and the City Manager in case any of you have any answers? It is a serious issue for our future generations of Malibu, and I was certainly shocked reading all the recent information and studies available on this. As Blue City certified now I'd hope Malibu would be willing to address this.

Just a few weeks ago the Coastal Commission released its "Critical Infrastructure At Risk - Sea Level Rise Planning Guidance for California's Coastal Zone's Public Review Draft" dated August 2021.

https://documents.coastal.ca.gov/assets/slr/SLR%20Guidance_Critical%20Infrastructure_8.16.21_FINAL_FullPDF.pdf

Right at the beginning it states "that oftentimes a solution embraced by coastal communities is to armor the shoreline to protect infrastructure (such as sea walls). While this may be a reasonable alternative to be considered in the short- and mid-term, it is often less clearly understood that such armoring can have significant adverse impacts on the beach and the shoreline where the armoring is installed. In fact, reliance on shoreline armoring as a long-term solution will eventually lead to the loss of many beaches and wetlands – eliminating precious recreational opportunities and whole ecosystems, as well as their related benefits, such as biodiversity, fish nurseries, flood protection, and water quality enhancement. These are the elements of our coast that provide a social fabric and identify and drive local communities and economies. Their protection must also be an important part of the infrastructure adaptation discussion."

It goes on later to state on p viii: "Moreover, the physical land on which infrastructure is currently located will in some

cases be submerged under water in the future, fundamentally changing the landscape and limiting potential adaptation strategies...Finally, planning infrastructure adaptation can take decades...and magnifying the uncertainty." Right now near Coastline and PCH the erosion almost reaches PCH there exposing electrical conduit, etc. (see attached photo) Mitigation can prevent this erosion rather than the taxpayers paying for the repair, relocation or rebuilding after the fact. Also what just recently occurred at Westward Beach should be a real wakeup call to this reality which I know concerns many of you.

The \$51 million project at Sycamore Canyon will be just one of many **temporary** fixes along our coastline without long term solutions.

The Guidance recommends local governments and asset managers prioritize nature-based adaptation strategies in all new sea level rise adaptation planning efforts. It also recommends that state agencies work together to strengthen and accelerate opportunities for using nature-based adaptation strategies.

I understand the **Malibu Living Shoreline Project** is delayed because of Covid. Santa Monica apparently is having success with their pilot program in lowering beach erosion and improving flora and fauna near the Annenburg on approximately 3 acres. As avid birdwatchers Colin and I appreciate this.

When will Malibu start this project?

Also in the Coastal Commission's document - all communities and asset managers should consider the following principles in infrastructure planning:

"...Site infrastructure to avoid hazards. Where hazard avoidance is not feasible, **prioritize nature based adaptation strategies over hard shoreline armoring.**"

I counted 5 beachfront projects approved and most of them started from Big Rock to the Ellison 4 lot project at Carbon Beach (22214-22230 PCH) which approval was actually based only on sea level rise of 8-18" over a 100 year period when the coastal commission report suggests this figure is more like 10 ft (in less than that time) by the year 2100. Will you stop approving such huge new beachfront development until we have long term beach erosion mitigation projects in place? Otherwise these places will eventually increase the beach erosion and thus increase the rate of sea level rise on these already narrowed beaches and soon enough all of these homes will be "submerged".

According to the Sea Level Vulnerability Assessment - the Coastal Conservancy study completed April 19, 2016 for the high estimate of sea-level rise scenario, the beach erosion and wave runup analysis suggests that Nicholas Canyon Beach may be completely eroded by 2040 if no shoreline measure is implemented. This is less than 20 years away. Malibu Surfrider Beach, Topanga Beach, and Will Rogers State Beach will only have approximately 50% of beach or less left in 2040. These four beaches are forecast to be completely eroded by 2100. The analysis results suggest that Zuma Beach and Point Dume Beach will have 50% of beach left in 2040, and more than 30% of beach remaining in 2100. We should prepare for this worse case scenario and the City should put plans in place sooner than later. (see p 20)

http://file.lacounty.gov/SDSInter/dbh/docs/247261_LACO_SLR_Vulnerability_FinalReport_19Apr2016.pdf

"Saltwater intrusion associated with increased sea level potentially renders existing treatment plants, water intake facilities, and groundwater wells unusable" (p 105 of the Coastal Guidance doc) which is a concern as a Big Rock resident with an elaborate dewatering system that could possibly be infiltrated with sea level rise and cause further destabilization.

Also with regards to my public comment tonight opposing the Sea View Hotel I thought I stated "100 person use septic system" not "100 room" as that would be the approximate amount of people using the facilities every day including staff and guests. With the issues of the carrying capacity already over the limit on PCH as well as all the above issues a CEQA review should be applied to any build in a geohazardous, beachfront or heavy traffic area of PCH in Malibu from now on given all the risks to the sensitive, rural coastal environment.

Thank you and I look forward to a response on next action steps.

Jo Drummond